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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

11 ADRIAN RISKIN,
12 Petitioner,
13 vs.
14 THE ACCELERATED SCHOOLS,
15 Respondent.

Case No. **19STCP05135**

**VERIFIED PETITION FOR WRIT OF
MANDATE AND COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

**[Gov't Code § 6250, *et seq.*; Civ. Proc.
Code §§ 1060, 1085; Civ. Code § 3422]**

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21 **INTRODUCTION**

22 1. This is a petition to enforce the California Public Records Act ("CPRA")
23 against Respondent, The Accelerated Schools. Petitioner Adrian Riskin submitted six
24 requests for public records to The Accelerated Schools ("TAS" or "Respondent"), which
25 TAS administers. These requests asked for access to clearly-identifiable records
26 fundamental to the Respondent's operation that is subject to mandatory disclosure under
27 the CPRA. Respondent failed to respond to the requests. Respondent has thereby
28 violated the CPRA.

2. The public's access to information is obstructed by Respondent's repeated and systemic violation of the CPRA. By this Petition and Complaint and pursuant to the Code of Civil Procedure §§ 1085, *et seq.* and Government Code §§ 6250, *et seq.*,¹ Petitioner respectfully requests from this Court: a writ of mandate to command TAS to disclose all non-exempt information Petitioner requested and thereby comply with the CPRA; a declaration that Respondent's conduct fails to comply with the CPRA; and a permanent injunction enjoining Respondent from continuing its pattern and practice of violating the CPRA.

JURISDICTION AND VENUE

3. This Court has jurisdiction under Gov't Code §§ 6258, 6259, Code of Civ. Proc. § 1085, and Article VI, Section 10 of the California Constitution.

4. Venue is proper in this Court. The records in question, or some portion of them, are situated in the County of Los Angeles, Gov't Code § 6259; the acts or omissions complained of occurred in the County of Los Angeles, Code of Civ. Proc. § 393; and Respondent is located in the County of Los Angeles, Code of Civ. Proc. § 395.

PARTIES

5. Petitioner Adrian Riskin is a resident of Los Angeles, holds a Ph.D. in mathematics, is a mathematics professor at a local college, and is an open records activist. Riskin utilizes public record requests to investigate and understand the activities of charter school corporations (“charters”), the trade association California Charter Schools Association (“CCSA”), the Los Angeles Unified School District (“LAUSD”), and the relationship between those entities. He publicizes his findings to the public through blogging and community events. Information Riskin has uncovered via CPRA requests has assisted academic researchers, education activists, and the public at large in understanding charter schools, their aggressive CCSA trade association, and the power these entities wield in the community. Riskin’s publication of emails obtained through CPRA requests to the Green Dot Charter School corporation led to the discovery that

¹ Unless stated otherwise, all references to code sections are to the California Government Code.

1 LAUSD Board Member Nick Melvoin had disclosed confidential school district legal
2 strategies to the CCSA, which was a party-opponent litigating against LAUSD at the
3 time. Parent groups organized a petition in response to Melvoin's conduct.² Parent
4 activists with the *K12 News Network* have written about how charter schools and the
5 CCSA tried to undermine efforts to "to make schools more accessible to disabled
6 students" using CPRA information disseminated by Riskin.³ Riskin is a member of the
7 public within the meaning of §§ 6252(b)-(c).

8 6. Respondent, THE ACCELERATED SCHOOLS, (hereinafter referred to as
9 "TAS"), is, and at all time pertinent to this petition and complaint has been, an entity
10 established by Education Code § 47615, in the County of Los Angeles, State of California.
11 TAS is a charter school organization operating as a non-profit public-benefit corporation
12 that operates three schools authorized by the Los Angeles Unified School District
13 ("LAUSD"). Respondent is subject to the CPRA as a matter of state law 2018 Cal. AG
14 LEXIS 13;; *1, 101 Ops. Cal. Atty. Gen. 92, ["a California charter school and its governing
15 body are subject to the Ralph M. Brown Act and the California Public Records Act."].

16 **FACTUAL BACKGROUND AND ALLEGATIONS**

17 7. As discussed in paragraph 5 supra, Riskin's work as an open records
18 activist has utilized the sunshine laws in ways that have been of maximum benefit to the
19 public. His research and promulgation of information uncovered by CPRA requests have
20 made a tangible and meaningful impact on open government, charter school activity, and
21 the enforcement of accountability laws in Los Angeles. This type of information cannot
22 be uncovered if charter school corporations do not comply with their statutory obligation
23 to make their records open for public inspection. Here, TAS' failure to produce requested
24 public records serves to maintain its activities in a shroud of secrecy and to shield its
25 operation from community oversight. TAS' refusal to respond to public records requests

26 ² Public School Families' Investigate Nick Melvoin petition [https://www.change.org/p/lausd-school-](https://www.change.org/p/lausd-school-board-investigate-nick-melvoin)
27 [board-investigate-nick-melvoin](https://www.change.org/p/lausd-school-board-investigate-nick-melvoin) [as of November 1, 2019]

28 ³ "Charter Schools Vs. Public School Students" [http://thewire.k12newsnetwork.com/2019/08/09/charter-](http://thewire.k12newsnetwork.com/2019/08/09/charter-schools-vs-public-school-students/)
[schools-vs-public-school-students/](http://thewire.k12newsnetwork.com/2019/08/09/charter-schools-vs-public-school-students/) [as of November 1, 2019]

1 violates the CPRA and frustrates the democratic process.

2 **TAS violated the CPRA by failing to provide public records in response**
3 **to each of Riskin's six requests**

4 TAS failed to lawfully respond to Riskin's January 19, 2019 request

5 8. On January 19, 2019 Riskin submitted a request for specific and identifiable
6 public records to Respondent. The request sought "emails along with their attachments if
7 any from 12/1/18 through 1/19/19 which are to or from board members or executive
8 staff of TAS which contain any of the following search terms: 1. UTLA 2. Strike 3. Monat
9 4. Yee 5. Benefits 6. Union 7. United 8. Bui 9. Goldstein" in their native electronic formats.
10 Riskin submitted the request by email to then TAS Chief Executive Officer ("CEO")
11 Johnathan Williams, and then TAS Board President Eric Johnson. A true and accurate
12 copy of this request, as well as subsequent communications between Riskin and
13 Respondent regarding this request, are attached to this petition as *Exhibit A*.

14 9. On February 3, 2019, five days after TAS' statutory deadline to respond
15 with a determination regarding Riskin's request—Riskin sent another email to Williams
16 and Johnson inquiring as to the status of his request. *See Exhibit A*.

17 10. On February 13, 2019 Riskin sent a follow-up email for the request, adding
18 three additional recipients, including David Borovay, Chief Financial Officer of TAS. On
19 February 13, 2019 Riskin received an "Automatic reply" from Borovay stating "I will no
20 longer be coming into the school on a regular basis. If you need immediate attention
21 please email Vincent Shih at vshih@accelerated.org". For both emails *see Exhibit A*.

22 11. On February 13, 2019, following the advice of the automated email from
23 Borovay, Riskin forwarded the entire thread of requests, including the original January
24 19, 2019 email requesting the public records, to Vincent Shih. Shih, who identified
25 themselves as TAS' Accounting Manager, emailed back on February 13, 2019 saying that
26 he was "new to the school", but that he would "assist in making sure" Riskin would
27 "have the appropriate records". Shih stated that he would "gather the information" by
28 that Friday. Friday of that week was February 15, 2019. For both emails *see Exhibit A*.

1 12. On February 23, 2019, Riskin sent yet another follow-up email for the
2 request. 36 days had passed since the original January 19, 2019 request discussed in
3 paragraph 8, and 10 days had passed since the communication from TAS' Vincent Shih
4 discussed in paragraph 10. *See Exhibit A.*

5 13. On February 25, 2019 TAS sent Riskin an email composed on their official
6 letterhead. TAS' email erroneously stated that Riskin's January 19, 2019 email had not
7 been received by TAS until February 11, 2019, which still would have placed TAS'
8 communication over the statutory deadline. The email recounted portions of the CPRA
9 and asserted vague and ambiguous boilerplate text, including:

10 "Given the breadth of the requests, the documents you seek may be voluminous
11 and may require redaction. Accordingly, at this time, TAS is unable to determine
12 approximately when the responsive records will be available. But we will be in
13 touch when we have gathered the records." *See Exhibit A.*

14 This email from TAS did not include a full determination of disclosability or an estimated
15 date of production for all requested records, as required by law. *See* § 6253(c).

16 14. Over 10 months have now elapsed since Riskin submitted his January 19,
17 2019 CPRA request to TAS. Respondent has ignored Riskin's repeated status inquiries
18 regarding his request. TAS has not communicated with Riskin about the request since its
19 February 25, 2019 email, and has failed to provide any records responsive to Riskin's
20 request. It has further failed to provide a determination as to the records' disclosability or
21 an estimated date by which these requested documents will be produced, as required by
22 law. *See* § 6253(c).

23 TAS failed to lawfully respond to Riskin's January 24, 2019 request

24 15. On January 24, 2019 Riskin submitted a request for specific and identifiable
25 public records to Respondent. The request sought "from 12/1/18 through 1/24/19 which
26 are to or from board members or executive staff of TAS which are to or from any email
27 address at lausd.net or lacity.org" in their native electronic formats. Riskin submitted the
28 request by email to then TAS CEO Johnathan Williams, and then TAS Board President

1 Eric Johnson. A true and accurate copy of this request, as well as subsequent
2 communications between Riskin and Respondent regarding this request, are attached to
3 this petition as *Exhibit B*.

4 16. On February 8, 2019, five days after TAS' statutory deadline to respond
5 with a determination regarding Riskin's request—Riskin sent another email to Williams
6 and Johnson inquiring as to the status of his request. *See Exhibit B*.

7 17. On February 23, 2019 Riskin sent another follow-up email for the request,
8 adding that "A response is long overdue." *see Exhibit B*.

9 18. On February 25, 2019, TAS CEO Johnathan Williams wrote back "Apologies
10 for the delay. Please see initial response attached." Neither of the files provided were in
11 the native electronic format for emails expressly requested by Riskin under the CPRA,
12 nor where they responsive to the requests.⁴ That same day, February 25, 2019, Riskin
13 wrote back thanking Williams for acknowledging Riskin's previous requests, and
14 explaining that under the statute, TAS had "at most 24 days to calculate the estimate" of
15 the time required to produce records. For both emails *see Exhibit B*.

16 19. Also on February 25, 2019 TAS sent Riskin an email composed on their
17 official letterhead. TAS' email erroneously stated that Riskin's January 24, 2019 email had
18 not been received by TAS until February 11, 2019, which still would have placed TAS'
19 communication over the statutory deadline. The email recounted portions of the CPRA
20 and asserted vague and ambiguous boilerplate text, including:

21 "Given the breadth of the requests, the documents you seek may be voluminous
22 and may require redaction. Accordingly, at this time, TAS is unable to determine
23 approximately when the responsive records will be available. But we will be in
24 touch when we have gathered the records." *See Exhibit B*.

25 This email from TAS did not include a full determination of disclosability or an estimated
26 date of production for all requested records, as required by law. *See* § 6253(c).

27 ⁴ Riskin's requests for emails all contain the following language: "Please note that I need to see all of these
28 records in native electronic format as required by the California Public Records Act at section 6253.9(a).
Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST."

1 20. On April 5, 2019, Riskin sent another reminder email in regards to the
2 request. 72 days had passed since the original January 24, 2019 request discussed in
3 paragraph 15, and 40 days had passed since the communications from TAS' Johnathan
4 Williams discussed in paragraphs 18 and 19. Roughly an hour later, on On April 5, 2019,
5 Williams responded:

6 "Thank you for your email. The School is in the process of reviewing documents to
7 determine if they are responsive and to see if any California Public Records Act
8 exemptions apply. We anticipate on producing all responsive, non-exempt
9 documents shortly." *See Exhibit B.*

10 This email from TAS did not include a full determination of disclosability or an estimated
11 date of production for all requested records, as required by law. *See* § 6253(c).

12 21. Over 10 months have now elapsed since Riskin submitted his January 24,
13 2019 CPRA request to TAS. Respondent has obfuscated, misdirected, and outright
14 ignored Riskin's repeated status inquiries regarding his request. TAS has not
15 communicated with Riskin about the request since its April 5, 2019 email, and has failed
16 to provide any records responsive to Riskin's request. It has further failed to provide a
17 determination as to the records' disclosability or an estimated date by which these
18 requested documents will be produced, as required by law. *See* § 6253(c).

19 TAS failed to lawfully respond to Riskin's March 24, 2019 request

20 22. On March 24, 2019 Riskin submitted a request for specific and identifiable
21 public records to Respondent. The request sought, in pertinent part:

22 "to inspect, possibly to obtain copies of, records that will reveal the annual
23 compensation, i.e. salary + benefits, of every employee of The Accelerated Schools
24 as well as Board members if they are compensated. [¶] If any members of the
25 administrative staff have employment contracts I would like to see copies of those
26 as well."

27 Riskin submitted the request by email to then TAS CEO Johnathan Williams. A true and
28 accurate copy of this request, as well as subsequent communications between Riskin and

1 Respondent regarding this request, are attached to this petition as *Exhibit C*.

2 23. On April 10, 2019, 18 days after TAS' statutory deadline to respond with a
3 determination regarding Riskin's request—Riskin sent another email to Williams
4 inquiring as to the status of his request. Riskin "CCed" then TAS Human Resources
5 Manager Asha Marshall for the status request. Additionally, Riskin mentioned the
6 response was "overdue." *See Exhibit C*.

7 24. On April 11, 2019, TAS' Asha Marshall sent an email with an attached letter
8 composed on their official letterhead and dated April 10, 2019. TAS' letter claimed: "TAS
9 was unaware that your initial March 24 request was made pursuant to the California
10 Public Records Act." This was highly disingenuous, and perhaps even duplicitous, given
11 that the subject line of Riskin's January 24, 2019 email read "Subject: **CPRA request** (TAS.
12 2019.03.24.a)." [emphasis added]. TAS erroneously asserted that they only understood
13 the request to be pursuant to the CPRA when they received "a follow-up email regarding
14 the request." Aside from misstating the nature of Riskin's January 24, 2019 email, TAS'
15 email recounted portions of the CPRA and asserted vague and ambiguous boilerplate
16 text, including:

17 "Given the breadth of the requests, the documents you seek may be voluminous
18 and may require redaction. Accordingly, at this time, TAS is unable to determine
19 approximately when the responsive records will be available. But we will be in
20 touch when we have gathered the records." *See Exhibit C*.

21 Given that TAS has a relatively small board of directors, and manages only three schools,
22 a request for records of "annual compensation" of employees could not and can not be
23 reasonably considered "voluminous" in any fashion. Moreover, the limited scope, and
24 unequivocal specificity of Riskin's request objectively conflicts with the passage in TAS'
25 form letter that reads: "Given the breadth of the requests." The nature of Riskin's March
26 24, 2019 request lent itself to seemingly easily locatable and disclosable records. TAS
27 provided no explanation as to why there was no production of documents. Moreover, the
28 April 11, 2019 email and April 10, 2019 letter from TAS did not include a full

1 determination of disclosability or an estimated date of production for all requested
2 records, as required by law. *See* § 6253(c). For both the email and the letter *see Exhibit C*.

3 25. On May 1, 2019, having heard no response from Respondent for 21 days,
4 Riskin sent another follow-up email addressed to Marshall and CCed to Williams. The
5 email reminded TAS of their duties under the law, and once more requested records
6 responsive to the March 24, 2019 email. *See Exhibit C*.

7 26. On May 30, 2019, having heard no response from Respondent for 29 days,
8 Riskin sent another follow-up email addressed to Marshall and CCed to Williams. The
9 email read, in pertinent part: "Can you please comply with the law and either produce
10 these records or tell me when you plan to produce them? It is entirely unlawful to
11 continue to ignore my request." *See Exhibit C*.

12 27. On May 30, 2019, TAS sent an "Automatic reply" from an anonymous email
13 account at their domain ("<HumanResources@accelerated.org>") stating: "We have
14 received your message and will respond within 48 to 72 business hours." *See Exhibit C*.

15 28. On June 7, 2019, Riskin sent another follow-up email. This was 9 days after
16 TAS' automated email statement claiming they would "respond within 48 to 72 business
17 hours." *See Exhibit C*.

18 29. On June 23, 2019, 92 days after the initial CPRA request on March 24, 2019,
19 Riskin sent a follow-up email to TAS that stated "If I don't hear from you conclusively on
20 this matter by Friday, June 28, 2019, I will proceed as if you've explicitly denied me access
21 to these records." *See Exhibit C*.

22 30. On June 30, 2019, on knowledge and belief that TAS' Robert French had
23 replaced Johnathan "Williams and Asha Marshall at least in some capacities", Riskin
24 informed Respondent that he would extend his deadline from June 28, 2019 to July 12,
25 2019. He provided French with a forward of the original March 24, 2019, and stated he
26 would forward the subsequent communications between Riskin and Respondent
27 regarding the request. Riskin went on to inform TAS that he preferred TAS comply with
28 the law rather than have to litigate. *See Exhibit C*.

1 31. On July 8, 2019, Riskin forwarded his June 30, 2019 email discussed in
2 paragraph 30 supra to Robert French, and CCed Vincent Shih, Eric Johnson, David
3 Borovay, and several other recipients with either accelerated.org email addresses, or
4 related email addresses.

5 32. On July 8, 2019, Riskin received an “Automatic reply” to the forward of his
6 March 24, 2019 CPRA request from TAS’s David Borovay. The email stated “I will no
7 longer be coming into the school on a regular basis. If you need immediate attention
8 please email Vincent Shih at vshih@accelerated.org”. *See Exhibit C.*

9 33. On July 8, 2019, Riskin responded to TAS’ Vincent Shih, informing Shih that
10 the April 10, 2019 correspondence from TAS (see paragraph 24 supra) was not a
11 “response” in the sense of providing records or a due date under the CPRA. Riskin
12 carefully explained TAS’s duties under the law, how TAS had not been following the law,
13 and, as a courtesy, provided a link to the California Legislature’s website with the
14 pertinent Government Code (i.e. 6253 *et seq.*). *See Exhibit C.*

15 34. Over 7 months have now elapsed since Riskin submitted his March 24, 2019
16 CPRA request to TAS. Respondent has ignored Riskin’s repeated status inquiries
17 regarding his request. TAS has not communicated with Riskin about the request since its
18 April 11, 2019 email, and has failed to provide any records responsive to Riskin’s request.
19 It has further failed to provide a determination as to the records’ disclosability or an
20 estimated date by which these requested documents will be produced, as required by
21 law. *See* § 6253(c).

22 TAS failed to lawfully respond to Riskin’s April 5, 2019 first request

23 36. On April 5, 2019, 11:42 AM, Riskin submitted a request for specific and
24 identifiable public records to Respondent. The request read “I am seeking to inspect/
25 obtain copies of all emails present in the following two accounts from January 1, 2014
26 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com.
27 [¶] jwilliams@accelerated.org [¶] amarshall@accelerated.org” in their native electronic
28 formats. Riskin submitted the request by email to then TAS Chief Executive Officer

1 ("CEO") Johnathan Williams, and then TAS Human Resources Manager Asha Marshall. A
2 true and accurate copy of this request, as well as subsequent communications between
3 Riskin and Respondent regarding this request, are attached to this petition as *Exhibit D*.

4 37. On May 1, 2019, Riskin contacted TAS regarding the CPRA request made 27
5 days earlier, reminding TAS that the "response was due on April 15." *See Exhibit D*.

6 38. On May 30, 2019, having heard no response from Respondent at all to his
7 April 5, 2019 request, Riskin set a status email addressed to Marshall and CCed to
8 Williams." *See Exhibit D*.

9 39. On May 30, 2019, TAS sent an "Automatic reply" from an anonymous email
10 account at their domain ("<HumanResources@accelerated.org>") stating: "We have
11 received your message and will respond within 48 to 72 business hours." *See Exhibit D*.

12 40. On June 7, 2019, Riskin sent another follow-up email. This was 9 days after
13 TAS' automated email statement claiming they would "respond within 48 to 72 business
14 hours." It was 64 days since the original request. *See Exhibit D*.

15 41. On June 23, 2019, 80 days after the initial CPRA request on April 5, 2019,
16 Riskin sent a follow-up email to TAS CEO Johnathan Williams that stated "If I don't hear
17 from you conclusively on this matter by Friday, June 28, 2019, I will proceed as if you've
18 explicitly denied me access to these records." *See Exhibit D*.

19 42. On June 30, 2019 Riskin forwarded the original April 5, 2019 request to TAS'
20 Robert French as part of Riskin attempting to accommodate TAS and provide TAS an
21 opportunity to follow the law as discussed in paragraph 30 supra. *See Exhibit D*.

22 43. On July 8, 2019, Riskin forwarded his June 30, 2019 email discussed in
23 paragraph 42 supra to Robert French, and CCed Vincent Shih, Eric Johnson, David
24 Borovay, and several other recipients with either accelerated.org email addresses, or
25 related email addresses. *See Exhibit D*.

26 44. On August 18, 2019, 136 days after Riskin's initial CPRA request on April 5,
27 2019, he sent a final status request email to all the addresses discussed in in paragraph 43
28 supra. Unlike the first three CPRA request discussed earlier in this petition and

1 complaint, TAS never responded to any of Riskin's inquiries regarding this April 5, 2019
2 request. TAS email system did send an automated response, as alleged in paragraph 40
3 supra, which would reasonably indicate that their email system was working. TAS failed
4 to provide any records responsive to Riskin's request. It has further failed to provide a
5 determination as to the records' disclosability or an estimated date by which these
6 requested documents will be produced, as required by law. See § 6253(c). See *Exhibit D*.

7 TAS failed to lawfully respond to Riskin's April 5, 2019 second request

8 45. On April 5, 2019, 11:47 AM, Riskin submitted a request for specific and
9 identifiable public records to Respondent. The request read "I am seeking to inspect/
10 obtain copies of all emails present in the accounts jwilliams@accelerated.org or
11 marshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to / from /
12 cc / bcc: [¶] 1. any email address at ccsa.org [¶] 2. any member of the board of trustees" in
13 their native electronic formats. Riskin submitted the request by email to then TAS Chief
14 Executive Officer ("CEO") Johnathan Williams, and then TAS Human Resources Manager
15 Asha Marshall. A true and accurate copy of this request, as well as subsequent
16 communications between Riskin and Respondent regarding this request, are attached to
17 this petition as *Exhibit E*.

18 46. On April 8, 2019, Marshall replied, in pertinent part: "Can you provide me
19 with the initial request for this CPRA? I have seen the emails between yourself and
20 Johnathan; however, I need additional information as to what this is about." Directly
21 below Marshall's statement was the original message with Riskin's April 5, 2019, 11:47
22 AM CPRA request in its entirety. See *Exhibit E*.

23 47. On April 8, 2019, Riskin replied to Marshall pointing out that "The initial
24 request is right there below in your response to me." See *Exhibit E*.

25 48. On April 8, 2019, Respondent wrote back to Riskin, despite having been
26 informed of both the seriousness and the content of the records request: "Please do not
27 contact our email addresses. This is a false request!" Riskin wrote back minutes later:
28 "What are you talking about? This is a CPRA request and you are required by law to

1 provide me access to records.” For both emails *see Exhibit E*.

2 49. On May 1, 2019, 27 days after the initial request, Riskin wrote TAS “I’m just
3 wondering about the status of this matter.” *See Exhibit E*.

4 50. On May 30, 2019, Riskin wrote another follow-up inquiring about status. 56
5 days had passed since the initial April 5, 2019, 11:47 AM request. *See Exhibit E*.

6 51. On June 7, 2019, having received no reply from TAS since the April 8, 2019
7 communications, Riskin sent a status request. *See Exhibit E*.

8 52. On June 23, 2019, Riskin wrote respondent: “If I don’t hear from you
9 conclusively on this matter by Friday, June 28, 2019, I will proceed as if you’ve explicitly
10 denied me access to these records.” 80 days had passed since the initial April 5, 2019,
11 11:47 AM request. *See Exhibit E*.

12 53. On June 30, 2019, Riskin forwarded the initial TAS’ Robert French the entire
13 April 5, 2019, 11:47 AM CPRA request in a good faith effort to provide TAS with another
14 opportunity to comply with the law. *See Exhibit E*.

15 54. On July 8, 2019, Riskin once more forwarded the April 5, 2019, 11:47 AM
16 CPRA request to French at TAS. In addition, he CCed Vincent Shih, Eric Johnson, David
17 Borovay, and several other recipients with either accelerated.org email addresses, or
18 related email addresses. *See Exhibit E*.

19 55. On August 18, 2019, 136 days the April 5, 2019, 11:47 AM CPRA request,
20 Riskin requested status from TAS once more. There was no response to this email.
21 Despite acknowledging that they had been receiving the emails (see ¶¶ 46 & 48) TAS
22 failed to provide any records responsive to Riskin’s request. TAS further failed to provide
23 a determination as to the records’ disclosability or an estimated date by which these
24 requested documents will be produced, as required by law. See § 6253(c). *See Exhibit E*.

25 TAS failed to lawfully respond to Riskin’s April 6, 2019 request

26 56. On April 6, 2019, Riskin submitted a request for specific and identifiable
27 public records to Respondent. The request read “all emails related to TAS business
28 possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that

1 are to/from/cc/bcc Kevin Sved at any email address.” in their native electronic formats.
2 Riskin submitted the request by email to then TAS Chief Executive Officer (“CEO”) Johnathan Williams, and then TAS Human Resources Manager Asha Marshall. A true
3 and accurate copy of this request, as well as subsequent communications between Riskin
4 and Respondent regarding this request, are attached to this petition as *Exhibit F*.

5
6 57. On May 1, 2019, 26 days after the initial request, Riskin wrote a follow-up
7 email to TAS saying “I’m just wondering about the status of this matter.” *See Exhibit F*.

8 58. May 30, 2019 saw Riskin send another follow-up email to TAS regarding the
9 April 6, 2019 CPRA records request. 55 days had elapsed. *See Exhibit F*.

10 59. That same day, TAS’ Williams finally replied claiming “I have not had
11 access to campus, and need to in order to get old email.” Williams also began an
12 unfinished sentence in regards to Ms. Marshall. Riskin responded with an email a minute
13 later saying “It’s been two months now. Please find a way to comply with the law and
14 provide me with these records.” Williams replied that “Marshall was no longer an
15 employee of” TAS. Williams then brazenly stated in the same email: “If, and when I get
16 access, I will respond.” For the three emails discussed in this paragraph *see Exhibit F*.

17 60. The exchange on May 30, 2019 continued with Riskin replying to William’s
18 flippant comment regarding disclosure of the public records:

19 This is not how the law works. Your organization is subject to the public records act
20 and has control over its records. You can’t just stall by saying you don’t have access.
21 Someone must have access. Please find out who it is and get them to produce these
22 records. [¶] Also, it’s really dubious that you don’t have access to your emails.
23 You’re sending emails through your server right now, which requires access. Why
24 don’t you use Outlook on a computer wherever you are, or install Thunderbird,
25 and use one of those to download your emails?

26 Williams replied, stating “I am responding from a mobile device, and need access to my
27 desktop for archived emails.” Riskin replied by patiently explaining the law, going as far
28 as to cite *Community Youth Athletic Center v. City of National City*. Williams stopped

1 replying. All in all, there were seven emails exchanged by Riskin and Williams on May
2 30, 2019. It was the most engagement Riskin had managed to get out of TAS' officers and
3 administration to that point, but still did not result in TAS complying with the law. If
4 Williams' statements in his emails are indicative of TAS' understanding of the CPRA,
5 then it would seem that TAS did not believe they were subject to the laws of California.
6 For the three emails discussed in this paragraph *see Exhibit F*.

7 61. On June 6, 2019, Riskin sent yet another email requesting a status update on
8 request. 63 days had now elapsed since the CPRA request. Williams replied "I should
9 have access tomorrow and Sun." For both emails *see Exhibit F*.

10 62. On June 23, 2019, 79 days after the April 6, 2019 request, Riskin wrote
11 Respondent saying "If I don't hear from you conclusively on this matter by Friday, June
12 28, 2019, I will proceed as if you've explicitly denied me access to these records." *see*
13 *Exhibit F*.

14 63. On July 8, 2019, Riskin forwarded his April 6, 2019 email discussed in
15 paragraph 56 *supra* to TAS' Robert French, and CCed Vincent Shih, Eric Johnson, David
16 Borovay, and several other recipients with either accelerated.org email addresses, or
17 related email addresses. *see Exhibit F*.

18 64. On July 8, 2019, 94 days after the April 6, 2019 CPRA request, TAS' Vincent
19 Shih replied, in pertinent part:

20 "Thank you for your patience in this matter. The District sent you its response to
21 your March 18 and March 24 PRA requests. We are still in the process of locating
22 the documents that you requested. If there are responsive, non-exempt documents,
23 you should expect that production shortly."

24 Shih's statement was incorrect in regards to Riskin's March 24, 2019 request, which still
25 has not been complied with to date. The March 18, 2019 request, which is not at issue in
26 this petition/complaint, was fulfilled, demonstrating that Respondent could have
27 complied with the law, but willfully chose not to in all the instances described herein. For
28 Shih's email *see Exhibit F*.

1 65. On July 8, 2019, Riskin wrote back to Shih: “As it happens, I do have a
2 question. A response to this request was due more than three months ago by law, and
3 yet, even now, you all have failed to respond to it adequately. The question is, of course,
4 when may I expect a legally sufficient response?” *see Exhibit F*.

5 66. On August 3, 2019, 120 days after his CPRA request on April 6, 2019, Riskin
6 wrote TAS “I’m just wondering what’s up with this matter. Please don’t continue to
7 ignore it.” *see Exhibit F*.

8 67. On August 5, 2019, TAS’ Vincent Shih wrote back “Your request is currently
9 in production and being reviewed. It will be sent to you shortly.” More than 120 days
10 from the initial request, and TAS was still unable to provide Riskin with an estimated
11 date of production. *see Exhibit F*.

12 68. On August 18, 2019, Riskin sent one last follow-up email that contained a
13 reminder that TAS should comply with the law. This final request was 135 days after the
14 initial request on April 6, 2019. TAS failed to provide any records responsive to Riskin’s
15 request. TAS further failed to provide a determination as to the records’ disclosability or
16 an estimated date by which these requested documents will be produced, as required by
17 law. See § 6253(c). *See Exhibit F*.

18 **Summary of Factual Background and Allegations**

19 69. Respondent TAS has failed to provide various basic records in response to
20 all six of Riskin’s CPRA requests. In the case of the January requests, its been nearly a
21 year. In the case of the last request made in April, it’s been over seven months.
22 Respondent has also repeatedly failed to provide a determination as to whether the
23 requested records are disclosable or an estimate as to when the requested records will be
24 produced. Respondent has therefore repeatedly and as a matter of course violated the
25 CPRA. Respondent’s pattern and practice of failing to produce public records in response
26 to requests effectively makes the operations of the TAS secret and shields Respondent
27 from public accountability. Judicial action is therefore necessary to enforce the
28 requirements of the CPRA against Respondent.

1 **FIRST CAUSE OF ACTION**

2 **Petition for Writ of Mandate Pursuant to the California Public Records Act,**
3 **Gov't Code § 6250, *et seq.***

4 70. Petitioner incorporates herein by reference the allegations of paragraphs 1
5 through 69 above, as if set forth in full.

6 General Principles of the California Public Records Act

7 71. Under the California Public Records Act, § 6250 *et seq.*, all records that are
8 prepared, owned, used, or retained by any public agency and that are not subject to the
9 CPRA's statutory exemptions to disclosure must be made publicly available for
10 inspection and copying upon request. §§ 6253(a)-(b).

11 72. When a member of the public submits a records request to an agency, the
12 agency is given ten days to determine whether the request seeks copies of disclosable
13 public records in the possession of the agency and must promptly notify the requestor of
14 that determination and the reasons therefor. § 6253(c). In statutorily-identified "unusual
15 circumstances," and "only to the extent reasonably necessary to the proper processing of
16 the particular request," this time period may be extended a maximum of 14 days. §
17 6253(c)-(d).

18 73. The law requires that agencies make non-exempt public records available to
19 requestors "promptly." § 6253(b). It is unlawful for an agency "to delay or obstruct the
20 inspection of public records." § 6253(d).

21 74. Where an agency withholds responsive records on the basis of a statutory
22 exemption, "the agency must disclose that fact." *Haynie v. Super. Ct.* 26 Cal. 4th 1061, 1072
23 (2001) (citing § 6255). Even if portions of a document are exempt from disclosure, the
24 agency must disclose the remainder of the document. § 6253(a). The agency bears the
25 burden of justifying nondisclosure. § 6255(a). In determining whether exemptions apply,
26 courts must follow the constitutional imperative that the applicability of exemptions
27 must be construed narrowly and that the people's right of access to public information
28 must be construed broadly. Cal. Constitution, Art. I, § 3(b)(2).

1 75. The CPRA also requires the government to “assist the member of the public
2 [to] make a focused and effective request that reasonably describes an identifiable record
3 or records” by taking steps to “[a]ssist the member of the public to identify records and
4 information that are responsive to the request or to the purpose of the request, if stated.”
5 § 6253.1. An agency receiving a request must also “[p]rovide suggestions for overcoming
6 any practical basis for denying access to the records or information sought.” *Id.*

7 76. Whenever it is made to appear by verified petition to the Superior Court of
8 the county where the records or some part thereof are situated that certain public records
9 are being improperly withheld from a member of the public, the Court shall order the
10 officer or person charged with withholding the records to disclose the public record or
11 show cause why he or she should not do so. The Court shall decide the case after
12 examining the record in camera (if permitted by the Evidence Code), papers filed by the
13 parties, and any oral argument and additional evidence as the Court may allow. §
14 6259(a). If the Court finds that the failure to disclose is not justified, it shall order the
15 public official to make the record public. § 6259(b).

16 77. A petitioner prevails under the CPRA where the petitioner shows that an
17 agency unlawfully denied access to records. *Community Youth Athletic Center v. City of*
18 *National City*, 220 Cal.App.4th 1385, 1446-1447 (2013). An agency is not protected from
19 liability merely because the denial of access was due to the agency’s internal logistical
20 problems or general neglect of its duties. *Id.*

21 78. The CPRA further contains a mandatory attorney’s fee provision for the
22 prevailing plaintiff. § 6259(d). The purpose of the provision is to provide “protections and
23 incentives for members of the public to seek judicial enforcement of their right to inspect
24 public records subject to disclosure.” *Filarsky v. Super. Ct.*, 28 Cal.4th 419, 427 (2002).

25 79. Here, Respondent TAS has repeatedly violated the CPRA by failing to
26 promptly disclose the public records that Riskin requested. The public records that Riskin
27 requested are not properly subject to any of the CPRA’s statutory exemptions, nor did
28 Respondent cite any exemptions to justify its nondisclosure. Respondent therefore acted

1 unlawfully in contravening its duty to make such records available.

2 Respondent Has Denied Access to Riskin's Requested Records
3 through Delay and Non-Response

4 80. In response to all six of Riskin's requests for disclosable public records,
5 Respondent TAS has denied access to requested records through its pattern and practice
6 of delay and non-response. Respondent failed to provide even a single record in response
7 to all six requests. Respondent has therefore repeatedly violated the CPRA.

8 81. First, Respondent has repeatedly failed to provide Riskin with a
9 determination as to whether his requested records are disclosable—let alone to do so
10 within the required 10-day statutory period. *See* § 6253(c). For Riskin's requests
11 submitted on each date, Respondent failed to provide a determination of disclosability or
12 any other information about the requested records. These responses, or lack thereof, do
13 not comply with the CPRA.

14 82. Further, Respondent failed to provide Riskin with an estimated date by
15 which his requested records will be produced as required by law. *See* § 6253(c). Despite
16 Riskin's repeated emails asking for updates as to when the requested records would be
17 produced, Respondent has provided Riskin with no information as to their likely date of
18 disclosure. By repeatedly failing to provide Riskin with an estimated date of production,
19 Respondent has again violated the CPRA.

20 83. Respondent has failed to provide any of the basic and fundamental records
21 that Riskin requested. It has been over 10 months since Riskin submitted his first request,
22 and more than 7 months since he submitted his most recent request, but Respondent has
23 still failed to produce the requested public records. Respondent has thereby unlawfully
24 denied access to these documents, all of which carry a strong public interest in disclosure.
25 By failing to produce even one of these public records, Respondent is maintaining in a
26 shroud of secrecy records related to the TAS' most basic day-to-day operations.
27 Respondent has failed to provide these records at all—let alone “**promptly**,” as required
28 by the CPRA. § 6253(b) [emphasis added].

1 84. Respondent's denial of access and its failure to even communicate with
2 Riskin regarding his requests not only violates the letter of the CPRA, but also its spirit.
3 The CPRA is predicated on the principle that:

4 "Openness in government is essential to the functioning of democracy. Implicit in
5 the democratic process is the notion that government should be accountable for its
6 actions. In order to verify accountability, individuals must have access to
7 government files. Such access permits checks against the arbitrary exercise of
official power and secrecy in the political process."

8 *Int'l Fed. Of Professional and Technical Engineers, Local 21, AFL-CIO v. Super. Ct.*, 42 Cal.4th
9 319, 328-29 (2007) (internal quotations omitted). By repeatedly failing to respond to
10 requests for such long periods of time, Respondent TAS denies the public access to vital
11 public information, and it withholds access to records while they are current and most
12 relevant to the public interest. It further shields itself from public scrutiny and frustrates
13 the democratic process.

14 **SECOND CAUSE OF ACTION**

15 **Declaratory Relief Pursuant to the California Public Records Act,**

16 **Gov't Code § 6250, et seq., Code of Civ. Proc. § 1060**

17 85. Petitioner incorporates herein by reference the allegations of paragraphs 1
18 through 69 above, as if set forth in full.

19 86. Petitioner is entitled to seek declaratory relief due to violation of the CPRA.
20 § 6258. Petitioner has performed all conditions precedent to filing this petition. There are
21 no administrative exhaustion requirements under Government Code § 6250, et seq.
22 Petitioner has no plain, speedy, adequate remedy in the ordinary course of law other than
23 the relief sought in this petition. *See* Code of Civil Procedure § 1086.

24 87. TAS has a clear, present, ministerial duty to comply with Government Code
25 § 6250, et seq. Respondent has repeatedly acted and continues to act in violation of the
26 CPRA by maintaining a pattern and practice of denial of access to public information
27 through failure to produce public records, impermissible delay, and non-responsiveness.
28 § 6253(b), (d).

88. An actual controversy exists between the parties concerning whether Respondent TAS has engaged in conduct that violates the clear statutory requirements of the CPRA. A judicial determination to resolve this actual controversy is necessary and appropriate at this time.

THIRD CAUSE OF ACTION

Injunctive Relief Pursuant to the California Public Records Act,

Gov't Code § 6250, *et seq.*, Civ. Code § 3422

89. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 69 above, as if set forth in full.

90. Petitioner is entitled to seek injunctive relief due to violation of the CPRA. § 6258. If not enjoined by order of this Court, Respondent will continue its pattern and practice of unlawfully denying and delaying access to public records, disregarding statutory requirements, and arbitrarily preventing parties from obtaining disclosable information under the CPRA.

91. Petitioner does not have a plain, speedy, and adequate remedy in the ordinary course of law.

PRAYERS FOR RELIEF

WHEREFORE, Petitioner prays for judgment as follows:

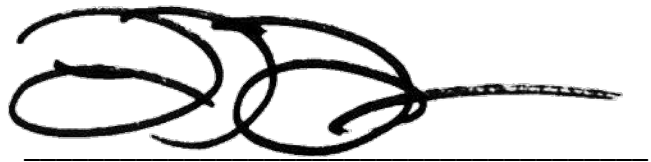
1. For issuance a writ of mandate directing Respondent to provide Petitioner with all requested records *promptly*, except those records that the Court determines may lawfully be withheld;
2. For the Court to set “times for responsive pleadings and for hearings in these proceedings... with the object of securing a decision as to these matters at the earliest possible time,” as provided in Government Code Section 6258;
3. For a declaration that Respondent’s conduct, policies, and pattern and practice of denying access to public records violates the CPRA;
4. For a permanent injunction enjoining Respondent, its agents, employees, officers, and representatives from continuing its existing pattern and practice of

1 violating the statutory requirements of the CPRA;

- 2 5. For Petitioner to be awarded reasonable attorney's fees and costs incurred in
3 bringing this action, as provided in Government Code Section 6258, Code of
4 Civil Procedure Section 1021.5; and California's private attorney general
5 doctrine; and
6 6. For such other and further relief as the Court deems proper and just.

7
8 DATED: November 23, 2019
9

10 Respectfully Submitted,

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14 Robert D. Skeels, Esq.

15 Attorney for Petitioner and Plaintiff
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VERIFICATION

I, ADRIAN RISKIN, am the Petitioner and Plaintiff in this action. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, and I know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and, as to those matters, I also believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this the 24th day of November, 2019 in Los Angeles, California.



ADRIAN RISKIN Petitioner and Plaintiff

Exhibit A

Subject: request for public records

From: Reina del Sur <reinadelsur213@gmail.com>

Date: 1/19/19, 6:45 PM

To: jwilliams@accelerated.org, ericj@victory-group.com

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: Re: request for public records
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 2/3/19, 4:55 PM
To: jwilliams@accelerated.org, ericj@victory-group.com

Good afternoon TAS,

I am enquiring as to the status of this request. A response was due last Wednesday.

I thank you for your anticipated cooperation and compliance with the law

On Sat, Jan 19, 2019 at 6:45 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: Re: request for public records

From: Reina del Sur <reinadelsur213@gmail.com>

Date: 2/13/19, 4:36 PM

To: jwilliams@accelerated.org, ericj@victory-group.com, dborovay@accelerated.org, Board@accelerated.org, mwatson@accelerated.org

Dear TAS,

I'm just wondering what's up with this request? Please answer soon!

On 2/3/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good afternoon TAS,

I am enquiring as to the status of this request. A response was due last Wednesday.

I thank you for your anticipated cooperation and compliance with the law

On Sat, Jan 19, 2019 at 6:45 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: Automatic reply: request for public records
From: David Borovay <dborovay@accelerated.org>
Date: 2/13/19, 4:36 PM
To: Reina del Sur <reinadelsur213@gmail.com>

I will no longer be coming into the school on a regular basis. If you need immediate attention please email Vincent Shih at vshih@accelerated.org

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Subject: Fwd: request for public records
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 2/13/19, 4:37 PM
To: vshih@accelerated.org

----- Forwarded message -----

From: Reina del Sur <reinadelsur213@gmail.com>
Date: Wed, 13 Feb 2019 16:36:15 -0800
Subject: Re: request for public records
To: jwilliams@accelerated.org, ericj@victory-group.com,
dborovay@accelerated.org, Board@accelerated.org,
mwatson@accelerated.org

Dear TAS,

I'm just wondering what's up with this request? Please answer soon!

On 2/3/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good afternoon TAS,

I am enquiring as to the status of this request. A response was due last Wednesday.

I thank you for your anticipated cooperation and compliance with the law

On Sat, Jan 19, 2019 at 6:45 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Fwd: request for public records

Subject: RE: request for public records
From: Vincent Shih <vshih@accelerated.org>
Date: 2/13/19, 6:26 PM
To: Reina del Sur <reinadelsur213@gmail.com>

Thank you for your email. As I am relatively new to the school, I was not involved with any of your requested information.

However, I will assist in making sure you have the appropriate records. Please allow me through Friday so I can gather the information.

Regards,

Vincent Shih
Accounting Manager
The Accelerated Schools
Phone: (323) 235-6343 ext. 2634

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

-----Original Message-----

From: Reina del Sur <reinadelsur213@gmail.com>
Sent: Wednesday, February 13, 2019 4:37 PM
To: Vincent Shih <vshih@accelerated.org>
Subject: Fwd: request for public records

----- Forwarded message -----

From: Reina del Sur <reinadelsur213@gmail.com>
Date: Wed, 13 Feb 2019 16:36:15 -0800
Subject: Re: request for public records
To: jwilliams@accelerated.org, ericj@victory-group.com, dborovay@accelerated.org,
Board@accelerated.org, mwatson@accelerated.org

Dear TAS,

I'm just wondering what's up with this request? Please answer soon!

On 2/3/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good afternoon TAS,

I am enquiring as to the status of this request. A response was due last Wednesday.

I thank you for your anticipated cooperation and compliance with the

law

On Sat, Jan 19, 2019 at 6:45 PM Reina del Sur

[<reinadelsur213@gmail.com>](mailto:reinadelsur213@gmail.com)

wrote:

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

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Subject: Re: request for public records

From: Reina del Sur <reinadelsur213@gmail.com>

Date: 2/23/19, 7:35 PM

To: jwilliams@accelerated.org, ericj@victory-group.com, dborovay@accelerated.org, Board@accelerated.org, mwatson@accelerated.org

Dear TAS,

Please respond to this soon as required by law. Response was due at the end of January.

I thank you for your anticipated cooperation and compliance with the law.

On Wed, Feb 13, 2019 at 4:36 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Dear TAS,

I'm just wondering what's up with this request? Please answer soon!

On 2/3/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good afternoon TAS,

I am enquiring as to the status of this request. A response was due last Wednesday.

I thank you for your anticipated cooperation and compliance with the law

On Sat, Jan 19, 2019 at 6:45 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike
3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.



The Accelerated Schools

Accelerated Charter Elementary School (ACES)

The Accelerated School (TAS)

Wallis Annenberg High School (WAHS)

Founder & CEO

Johnathan X. Williams

Chief Academic Officer

Grace Lee Chang

February 25, 2019

VIA EMAIL ONLY

reinadelsur213@gmail.com

Re: TAS Response to CPRA Request Dated January 19, 2019

The Accelerated School

Francis Reading, Principal

Dear Requestor:

Wallis Annenberg High School

Rebecca Handzel, Principal

This letter serves as The Accelerated School's ("TAS") response to your California Public Records Act ("CPRA") request dated January 19, 2019, and received on February 11, 2019. Under the CPRA, TAS is required to make public records available for inspection or to permit you to obtain copies, unless the record is subject to an exemption. Public records are "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency." (Gov. Code, § 6252, subd. (e).) Except for public records that are exempt from disclosure, TAS is required to disclose records when it receives a request for an identifiable record. TAS is not required to create documents that do not otherwise exist. (Gov. Code, § 6253, subd. (b).)

**Accelerated Charter
Elementary School**

Susan Raudry, Principal

TAS will provide responsive records within its possession, custody and control, which are subject to disclosure under the CPRA. TAS will not provide records that are protected by state or federal law including, but not limited to, information protected under the Family Educational Rights and Privacy Act, the Confidentiality of Medical Information Act, the attorney-client privilege or work product protection doctrine, the official information privilege, or the deliberative process privilege. (See, Gov. Code § 6254, subd. (k).) TAS also will not provide any records related to pending litigation, personnel, medical, or similar files, the disclosure of which would constitute and unwarranted invasion of personal privacy. (See, Gov. Code, § 6254, subd. (b), (c).) Additionally, TAS will not provide any records where the public interest in withholding the record clearly outweighs the public interest served by disclosure of the record. (Gov. Code, § 6254, subd. (a).)

TAS responds to your specific requests as follows:

Request Number 1

Emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms:

1. UTLA
2. Strike

3. Monat
4. Yee
5. Benefits
6. Union
7. United
8. Bui
9. Goldstein

Response to Request Number 1

TAS will provide you with non-exempt responsive records within its possession, custody and control, which are subject to disclosure under the CPRA.

Please be advised that pursuant to Gov. Code sections 6254 and 6255, certain information that is exempt from disclosure will not be disclosed or will be redacted from the records. TAS reserves the right to supplement this response upon accessing and reviewing responsive records, and determining the applicable exemption.

Given the breadth of the requests, the documents you seek may be voluminous and may require redaction. Accordingly, at this time, TAS is unable to determine approximately when the responsive records will be available. But we will be in touch when we have gathered the records. At that time, we will be able to provide an estimate of the cost to provide you copies.

Sincerely,



Johnathan Williams

Exhibit B

Subject: request for public records 2
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 1/24/19, 9:52 AM
To: jwilliams@accelerated.org, ericj@victory-group.com

Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: Re: request for public records 2
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 2/8/19, 8:27 PM
To: jwilliams@accelerated.org, ericj@victory-group.com

Good evening, TAS.

I am writing to enquire as to the status of this request as a response was due on Monday and yet no one has responded.

thank you

On 1/24/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: Re: request for public records 2
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 2/23/19, 7:39 PM
To: jwilliams@accelerated.org, ericj@victory-group.com

Good evening TAS,

I am just wondering what is the status of this matter? A response is long overdue.

On Fri, Feb 8, 2019 at 8:27 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am writing to enquire as to the status of this request as a response was due on Monday and yet no one has responded.

thank you

On 1/24/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

Subject: RE: request for public records 2
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 2/25/19, 12:00 PM
To: Reina del Sur <reinadelsur213@gmail.com>

Apologies for the delay.
Please see initial response attached.
Thank you,
Johnathan

-----Original Message-----

From: Reina del Sur <reinadelsur213@gmail.com>
Sent: Saturday, February 23, 2019 7:40 PM
To: Johnathan Williams <jwilliams@accelerated.org>; ericj@victory-group.com
Subject: Re: request for public records 2

Good evening TAS,

I am just wondering what is the status of this matter? A response is long overdue.

On Fri, Feb 8, 2019 at 8:27 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am writing to enquire as to the status of this request as a response was due on Monday and yet no one has responded.

thank you

On 1/24/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

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— Attachments: —	
PRA City Dist.pdf	184 kB
PRA Negotiations.pdf	183 kB

Subject: Re: request for public records 2
From: Reina del Sur <reinadelsur213@gmail.com>
Date: 2/25/19, 2:05 PM
To: Johnathan Williams <jwilliams@accelerated.org>

Thanks for getting back to me. Mr. Williams.

The law requires very little of government agencies such as TAS in response to a request for public records, but it does require an estimated date of production. It allows at most 24 days to calculate the estimate. Please consider complying with the law and giving me a fact-based guess at when TAS might be able to start producing records.

On Mon, Feb 25, 2019 at 12:00 PM Johnathan Williams
<jwilliams@accelerated.org> wrote:

Apologies for the delay.
Please see initial response attached.
Thank you,
Johnathan
-----Original Message-----
From: Reina del Sur <reinadelsur213@gmail.com>
Sent: Saturday, February 23, 2019 7:40 PM
To: Johnathan Williams <jwilliams@accelerated.org>; ericj@victory-group.com
Subject: Re: request for public records 2

Good evening TAS,

I am just wondering what is the status of this matter? A response is long overdue.

On Fri, Feb 8, 2019 at 8:27 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am writing to enquire as to the status of this request as a response was due on Monday and yet no one has responded.

thank you

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Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

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The Accelerated Schools

Accelerated Charter Elementary School (ACES)

The Accelerated School (TAS)

Wallis Annenberg High School (WAHS)

Founder & CEO

Johnathan X. Williams

Chief Academic Officer

Grace Lee Chang

The Accelerated School

Francis Reading, Principal

Wallis Annenberg High School

Rebecca Handzel, Principal

**Accelerated Charter
Elementary School**

Susan Raudry, Principal

February 25, 2019

VIA EMAIL ONLY

reinadelsur213@gmail.com

Re: TAS Response to CPRA Request Dated January 24, 2019

Dear Requestor:

This letter serves as The Accelerated School's ("TAS") response to your California Public Records Act ("CPRA") request dated January 24, 2019, and received on February 11, 2019. Under the CPRA, TAS is required to make public records available for inspection or to permit you to obtain copies, unless the record is subject to an exemption. Public records are "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency." (Gov. Code, § 6252, subd. (e).) Except for public records that are exempt from disclosure, TAS is required to disclose records when it receives a request for an identifiable record. TAS is not required to create documents that do not otherwise exist. (Gov. Code, § 6253, subd. (b).)

TAS will provide responsive records within its possession, custody and control, which are subject to disclosure under the CPRA. TAS will not provide records that are protected by state or federal law including, but not limited to, information protected under the Family Educational Rights and Privacy Act, the Confidentiality of Medical Information Act, the attorney-client privilege or work product protection doctrine, the official information privilege, or the deliberative process privilege. (See, Gov. Code § 6254, subd. (k).) TAS also will not provide any records related to pending litigation, personnel, medical, or similar files, the disclosure of which would constitute and unwarranted invasion of personal privacy. (See, Gov. Code, § 6254, subd. (b), (c).) Additionally, TAS will not provide any records where the public interest in withholding the record clearly outweighs the public interest served by disclosure of the record. (Gov. Code, § 6254, subd. (a).)

TAS responds to your specific requests as follows:

Request Number 1

Copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Response to Request Number 1

Accelerated Charter Elementary School • 3914 E. Main Street • Los Angeles, CA 90011 • Office (323) 846-6694 • Fax (323) 846-0686
The Accelerated School • 4000 S. Main Street • Los Angeles, CA 90037 • Office (323) 235-6343 • Fax (323) 235-6346
TAS 2 • 119 E. 37th Street (K-2nd grade) • Los Angeles, CA 90011 • Office (323) 985-6369 • Fax (323) 846-0686
Wallis Annenberg High School • 4000 S. Main Street • Los Angeles, CA 90307 • Office (323) 235-6343 • Fax (323) 235-6346

www.accelerated.org

TAS will provide you with non-exempt responsive records within its possession, custody and control, which are subject to disclosure under the CPRA.

Please be advised that pursuant to Gov. Code sections 6254 and 6255, certain information that is exempt from disclosure will not be disclosed or will be redacted from the records. TAS reserves the right to supplement this response upon accessing and reviewing responsive records, and determining the applicable exemption.

Given the breadth of the requests, the documents you seek may be voluminous and may require redaction. Accordingly, at this time, TAS is unable to determine approximately when the responsive records will be available. But we will be in touch when we have gathered the records. At that time, we will be able to provide an estimate of the cost to provide you copies.

Sincerely,

A handwritten signature in blue ink that reads "Johnathan Williams". The signature is written in a cursive, flowing style.

Johnathan Williams

Subject: RE: request for public records 2
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 4/5/19, 12:35 PM
To: RDS <reinadelsur213@gmail.com>

Dear Reina del Sur,
Thank you for your email. The School is in the process of reviewing documents to determine if they are responsive and to see if any California Public Records Act exemptions apply. We anticipate on producing all responsive, non-exempt documents shortly.
Thank you,
Johnathan Williams

-----Original Message-----
From: RDS <reinadelsur213@gmail.com>
Sent: Friday, April 5, 2019 11:33 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Subject: Re: request for public records 2

Man Mr. Williams!

What is going on with this requests? It has literally been months. You never told me when you would answer despite fancy response letter. Please hand over the goods ASAP!

On 2/25/19 2:05 PM, Reina del Sur wrote:

Thanks for getting back to me. Mr. Williams.

The law requires very little of government agencies such as TAS in response to a request for public records, but it does require an estimated date of production. It allows at most 24 days to calculate the estimate. Please consider complying with the law and giving me a fact-based guess at when TAS might be able to start producing records.

On Mon, Feb 25, 2019 at 12:00 PM Johnathan Williams <jwilliams@accelerated.org> wrote:

Apologies for the delay.
Please see initial response attached.
Thank you,
Johnathan

-----Original Message-----
From: Reina del Sur <reinadelsur213@gmail.com>
Sent: Saturday, February 23, 2019 7:40 PM
To: Johnathan Williams <jwilliams@accelerated.org>; ericj@victory-group.com
Subject: Re: request for public records 2

Good evening TAS,

I am just wondering what is the status of this matter? A response is long overdue.

On Fri, Feb 8, 2019 at 8:27 PM Reina del Sur <reinadelsur213@gmail.com> wrote:

Good evening, TAS.

I am writing to enquire as to the status of this request as a response was due on Monday and yet no one has responded.

thank you

On 1/24/19, Reina del Sur <reinadelsur213@gmail.com> wrote:

Good morning, TAS.

I am seeking to inspect copies of emails along with their attachments if any from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org

Please note that I need to see all of these records in native electronic format as required by the California Public Records Act at section 6253.9(a). Native electronic format for emails is any of the file formats EML, MSG, MBOX, or PST.

I thank you for your anticipated cooperation and compliance with the law.

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Exhibit C

Subject: CPRA request (TAS.2019.03.24.a)

From: adrian@123mail.org

Date: 3/24/19, 5:52 PM

To: jwilliams@accelerated.org

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 4/10/19, 10:11 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>
CC: "Asha Marshall" <amarshall@accelerated.org>

Good morning, Mr. Williams.

I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

On Sun, Mar 24, 2019, at 5:52 PM, adrian@123mail.org wrote:

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

Subject: RE: CPRA request (TAS.2019.03.24.a)
From: Asha Marshall <amarshall@accelerated.org>
Date: 4/11/19, 12:06 PM
To: "adrian@elitemail.org" <adrian@elitemail.org>
CC: Johnathan Williams <jwilliams@accelerated.org>

Hello,

Please see attached CPRA Request Response Letter.

Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>
Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

Good morning, Mr. Williams.

I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

On Sun, Mar 24, 2019, at 5:52 PM, adrian@123mail.org wrote:

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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—Attachments:—

CPRA Request_3.24.19.pdf

121 kB



The Accelerated Schools

Accelerated Charter Elementary School (ACES)

The Accelerated School (TAS)

Wallis Annenberg High School (WAHS)

VIA EMAIL ONLY

adrian@123mail.org

April 10, 2019

Re: TAS Response to CPRA Request Dated March 24, 2019/April 10, 2019

Dear Requestor:

This letter serves as The Accelerated School's ("TAS") response to your California Public Records Act ("CPRA") request dated March 24, 2019. Please note, TAS was unaware that your initial March 24 request was made pursuant to the California Public Records Act. TAS only learned that you made the March 24 request pursuant to the California Public Records Act on April 10, 2019, after you sent a follow-up email regarding the request.

Under the CPRA, TAS is required to make public records available for inspection or to permit you to obtain copies, unless the record is subject to an exemption. Public records are "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency." (Gov. Code, § 6252, subd. (e).) Except for public records that are exempt from disclosure, TAS is required to disclose records when it receives a request for an identifiable record. TAS is not required to create documents that do not otherwise exist. (Gov. Code, § 6253, subd. (b).)

TAS will provide responsive records within its possession, custody and control, which are subject to disclosure under the CPRA. TAS will not provide records that are protected by state or federal law including, but not limited to, information protected under the Family Educational Rights and Privacy Act, the Confidentiality of Medical Information Act, the attorney-client privilege or work product protection doctrine, the official information privilege, or the deliberative process privilege. (See, Gov. Code § 6254, subd. (k).) TAS also will not provide any records related to pending litigation, personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy. (See, Gov. Code, § 6254, subd. (b), (c).) Additionally, TAS will not provide any records where the public interest in withholding the record clearly outweighs the public interest served by disclosure of the record. (Gov. Code, § 6254, subd. (a).)

TAS responds to your specific requests as follows:

Request Number 1

"Records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated."

Response to Request Number 1

TAS will provide you with non-exempt responsive records within its possession, custody and control, which are subject to disclosure under the CPRA.

Accelerated Charter Elementary School • 3914 E. Main Street • Los Angeles, CA 90011 • Office (323) 846-6694 • Fax (323) 846-0686
The Accelerated School • 4000 S. Main Street • Los Angeles, CA 90037 • Office (323) 235-6343 • Fax (323) 235-6346
TAS 2 • 119 E. 37th Street (K-2nd grade) • Los Angeles, CA 90011 • Office (323) 985-6369 • Fax (323) 846-0686
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www.accelerated.org



The Accelerated Schools

Accelerated Charter Elementary School (ACES)

The Accelerated School (TAS)

Wallis Annenberg High School (WAHS)

Please be advised that pursuant to Gov. Code sections 6254 and 6255, certain information that is exempt from disclosure will not be disclosed or will be redacted from the records. TAS reserves the right to supplement this response upon accessing and reviewing responsive records, and determining the applicable exemption.

Request Number 2

"If any members of the administrative staff have employment contracts I would like to see copies of those as well."

Response to Request Number 2


TAS will provide you with non-exempt responsive records within its possession, custody and control, which are subject to disclosure under the CPRA.

Please be advised that pursuant to Gov. Code sections 6254 and 6255, certain information that is exempt from disclosure will not be disclosed or will be redacted from the records. TAS reserves the right to supplement this response upon accessing and reviewing responsive records and determining the applicable exemption.

Given the breadth of the requests, the documents you seek may be voluminous and may require redaction. Accordingly, at this time, TAS is unable to determine approximately when the responsive records will be available. But we will be in touch when we have gathered the records. At that time, we will be able to provide an estimate of the cost to provide you copies.

I, Asha Marshall, Human Resources Manager of The Accelerated Schools, am responsible for the responses to this request.

Sincerely,



Asha Marshall
Human Resources Manager
The Accelerated Schools

Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 5/1/19, 10:31 AM
To: "Asha Marshall" <amarshall@accelerated.org>
CC: "Johnathan Williams" <jwilliams@accelerated.org>

Good day, Ms. Marshall, Mr. Williams.

Can you please provide me with these records soon? You've already failed to comply with the law by refusing to provide an estimated date of completion. The law forbids you to delay my access to this material except as necessary to carry out a good-faith attempt to determine which records, if any, are exempt from production. It's really, thoroughly, incredibly obvious in this case that none of these records are exempt. You claim in your response letter that the number of records I requested "may be voluminous," whatever that means, but in any case, it's not an excuse for delaying my access. Please provide these records as soon as possible.

Thanks!

Adrian

On Thu, Apr 11, 2019, at 12:06 PM, Asha Marshall wrote:

Hello,

Please see attached CPRA Request Response Letter.

Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>
Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

Good morning, Mr. Williams.

I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

On Sun, Mar 24, 2019, at 5:52 PM, adrian@123mail.org wrote:

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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Attachments:

* CPRA Request_3.24.19.pdf

Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 5/30/19, 3:28 AM
To: "Asha Marshall" <amarshall@accelerated.org>
CC: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, TAS.

Can you please comply with the law and either produce these records or tell me when you plan to produce them? It is entirely unlawful to continue to ignore my request.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:31 AM, adrian@elitemail.org wrote:

Good day, Ms. Marshall, Mr. Williams.

Can you please provide me with these records soon? You've already failed to comply with the law by refusing to provide an estimated date of completion. The law forbids you to delay my access to this material except as necessary to carry out a good-faith attempt to determine which records, if any, are exempt from production. It's really, thoroughly, incredibly obvious in this case that none of these records are exempt. You claim in your response letter that the number of records I requested "may be voluminous," whatever that means, but in any case, it's not an excuse for delaying my access. Please provide these records as soon as possible.

Thanks!

Adrian

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Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>

Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

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I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

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Good day, Mr. Williams.

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If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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Attachments:

* CPRA Request_3.24.19.pdf

Subject: Automatic reply: CPRA request (TAS.2019.03.24.a)
From: Human Resources <HumanResources@accelerated.org>
Date: 5/30/19, 3:28 AM
To: "adrian@elitemail.org" <adrian@elitemail.org>

We have received your message and will respond within 48 to 72 business hours.

Thank you,

Human Resources Department

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Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 6/7/19, 5:19 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, Mr. Williams!

I am just checking on the status of this matter.

Thanks,

Adrian

On Thu, May 30, 2019, at 3:28 AM, adrian@elitemail.org wrote:

Good morning, TAS.

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Thanks,

Adrian

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Thanks!

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Please see attached CPRA Request Response Letter.

Thank you,

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Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

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Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

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If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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Attachments:

* CPRA Request_3.24.19.pdf

Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 6/23/19, 9:17 PM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good evening, Mr. Williams.

If I don't hear from you conclusively on this matter by Friday, June 28, 2019, I will proceed as if you've explicitly denied me access to these records.

Thank you,

Adrian

On Fri, Jun 7, 2019, at 5:19 AM, adrian@elitemail.org wrote:

Good morning, Mr. Williams!

I am just checking on the status of this matter.

Thanks,

Adrian

On Thu, May 30, 2019, at 3:28 AM, adrian@elitemail.org wrote:

Good morning, TAS.

Can you please comply with the law and either produce these records or tell me when you plan to produce them? It is entirely unlawful to continue to ignore my request.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:31 AM, adrian@elitemail.org wrote:

Good day, Ms. Marshall, Mr. Williams.

Can you please provide me with these records soon? You've already failed to comply with the law by refusing to provide an estimated date of completion. The law forbids you to delay my access to this material except as necessary to carry out a good-faith attempt to determine which records, if any, are exempt from production. It's really, thoroughly, incredibly obvious in this case that none of these records are exempt. You claim in your response letter that the number of records I requested "may be voluminous," whatever that means, but in any case, it's not an excuse for delaying my access. Please provide these records as soon as possible.

Thanks!

Adrian

On Thu, Apr 11, 2019, at 12:06 PM, Asha Marshall wrote:

Hello,

Please see attached CPRA Request Response Letter.

Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>
Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <johnwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

Good morning, Mr. Williams.

I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

On Sun, Mar 24, 2019, at 5:52 PM, adrian@123mail.org wrote:

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Attachments:

* CPRA Request_3.24.19.pdf

Subject: Fwd: CPRA request (TAS.2019.03.24.a)
From: adrian@123mail.org
Date: 6/30/19, 12:28 PM
To: "Robert French" <rfrench@accelerated.org>

Good afternoon, Mr. French.

I am told that you've replaced J. Williams and Asha Marshall at least in some capacities. I have a number of requests for public records pending, some of them for more than three months, which they've been ignoring. I gave Williams a deadline of Friday 6/28 before I took action, which he didn't respond to.

But now that I understand that his position is altered I would like to give Accelerated another chance to comply with the law with respect to these requests. Thus I'm sending them to you. The first is appended here, and I will forward the others subsequently.

As I said, I would much, much rather have Accelerated comply than litigate this matter. However, I need these records pretty urgently and I'm certainly not inclined to wait another three months, really, not even a single month, to receive them.

Thus if I don't hear from you with a satisfactory and very detailed production schedule by Friday, July 12, 2019, I will proceed as if Accelerated has explicitly denied me access to these records.

Thank you, Mr. French!

Adrian

----- Original message -----

From: adrian@123mail.org
To: jwilliams@accelerated.org
Subject: CPRA request (TAS.2019.03.24.a)
Date: Sunday, March 24, 2019 5:52 PM

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

Subject: Re: Fwd: CPRA request (TAS.2019.03.24.a)

From: adrian@123mail.org

Date: 7/8/19, 9:08 AM

To: "Robert French" <rfrench@accelerated.org>

CC: vshih@accelerated.org, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

On Sun, Jun 30, 2019, at 12:28 PM, adrian@123mail.org wrote:

Good afternoon, Mr. French.

I am told that you've replaced J. Williams and Asha Marshall at least in some capacities. I have a number of requests for public records pending, some of them for more than three months, which they've been ignoring. I gave Williams a deadline of Friday 6/28 before I took action, which he didn't respond to.

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Thank you, Mr. French!

Adrian

----- Original message -----

From: adrian@123mail.org

To: jwilliams@accelerated.org

Subject: CPRA request (TAS.2019.03.24.a)

Date: Sunday, March 24, 2019 5:52 PM

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Re: Fwd: CPRA request (TAS.2019.03.24.a)

Thank you,

Adrian

Subject: Automatic reply: Fwd: CPRA request (TAS.2019.03.24.a)

From: David Borovay <dborovay@accelerated.org>

Date: 7/8/19, 9:08 AM

To: "adrian@123mail.org" <adrian@123mail.org>

I will no longer be coming into the school on a regular basis. If you need immediate attention please email Vincent Shih at vshih@accelerated.org

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Subject: Fwd: RE: CPRA request (TAS.2019.03.24.a)
From: adrian@123mail.org
Date: 7/8/19, 7:06 PM
To: "Vincent Shih" <vshih@accelerated.org>
CC: ericj@victory-group.com, ericj@victory-group.com, "Board Members" <board@accelerated.org>, "Mia Watson" <mwatson@accelerated.org>, sslovac@calstatela.edu, sslovac@calstatela.edu

Good evening, Mr. Shih!

Recently you told me that TAS had responded to this request. Evidently you were referring to this letter from Ms. Marshall. I apologize for being unclear. I wasn't using the word "response" in the sense of "answer" but rather in the sense in which it is used in the CPRA, which basically means "compliant with the requirements of the law as given in section 6253(c)." In this sense you all have not yet responded. As far as I'm aware, only the second type of response is required by law and yours is seriously overdue. Please remedy this situation as soon as possible. Here's a link to the code section for your convenience:

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=6253.

thank you!

Adrian

----- Original message -----

From: Asha Marshall <amarshall@accelerated.org>
To: "adrian@elitemail.org" <adrian@elitemail.org>
Cc: Johnathan Williams <jwilliams@accelerated.org>
Subject: RE: CPRA request (TAS.2019.03.24.a)
Date: Thursday, April 11, 2019 12:06 PM

Hello,

Please see attached CPRA Request Response Letter.

Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>
Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>

Fwd: RE: CPRA request (TAS.2019.03.24.a)

Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

Good morning, Mr. Williams.

I am just checking on the status of this as a response is overdue.

Thank you,

Adrian

On Sun, Mar 24, 2019, at 5:52 PM, adrian@123mail.org wrote:

Good day, Mr. Williams.

I would like to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated.

If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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— Attachments: —

CPRA Request_3.24.19.pdf

121 kB

Exhibit D

Subject: CPRA request (TAS.2019.04.05.a)
From: adrian@123mail.org
Date: 4/5/19, 11:42 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com.

jwilliams@accelerated.org
amarshall@accelerated.org

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.05.a)
From: adrian@123mail.org
Date: 5/1/19, 10:32 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, TAS!

I am writing to inquire about the status of these. A response was due on April 15.

Thanks,

Adrian

On Fri, Apr 5, 2019, at 11:42 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com.

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Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.03.24.a)
From: adrian@elitemail.org
Date: 5/30/19, 3:28 AM
To: "Asha Marshall" <amarshall@accelerated.org>
CC: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, TAS.

Can you please comply with the law and either produce these records or tell me when you plan to produce them? It is entirely unlawful to continue to ignore my request.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:31 AM, adrian@elitemail.org wrote:

Good day, Ms. Marshall, Mr. Williams.

Can you please provide me with these records soon? You've already failed to comply with the law by refusing to provide an estimated date of completion. The law forbids you to delay my access to this material except as necessary to carry out a good-faith attempt to determine which records, if any, are exempt from production. It's really, thoroughly, incredibly obvious in this case that none of these records are exempt. You claim in your response letter that the number of records I requested "may be voluminous," whatever that means, but in any case, it's not an excuse for delaying my access. Please provide these records as soon as possible.

Thanks!

Adrian

On Thu, Apr 11, 2019, at 12:06 PM, Asha Marshall wrote:

Hello,

Please see attached CPRA Request Response Letter.

Thank you,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@elitemail.org <adrian@elitemail.org>

Sent: Wednesday, April 10, 2019 10:12 AM
To: Johnathan Williams <jwilliams@accelerated.org>
Cc: Asha Marshall <amarshall@accelerated.org>
Subject: Re: CPRA request (TAS.2019.03.24.a)

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If any members of the administrative staff have employment contracts I would like to see copies of those as well.

Thank you,

Adrian

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Attachments:

* CPRA Request_3.24.19.pdf

Subject: Automatic reply: CPRA request (TAS.2019.04.05.a)
From: Human Resources <HumanResources@accelerated.org>
Date: 5/30/19, 3:28 AM
To: "adrian@123mail.org" <adrian@123mail.org>

We have received your message and will respond within 48 to 72 business hours.

Thank you,

Human Resources Department

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Subject: Re: CPRA request (TAS.2019.04.05.a)
From: adrian@123mail.org
Date: 6/7/19, 5:20 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, Mr. Williams!

I am just checking on the status of this matter.

Thanks,

Adrian

On Thu, May 30, 2019, at 3:28 AM, adrian@123mail.org wrote:

Good morning, TAS.

I'm just wondering what the status of this matter is.

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Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

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To: "Johnathan Williams" <jwilliams@accelerated.org>

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Thanks!

Adrian

Subject: Fwd: CPRA request (TAS.2019.04.05.a)
From: adrian@123mail.org
Date: 6/30/19, 12:29 PM
To: "Robert French" <rfrench@accelerated.org>

----- Original message -----

From: adrian@123mail.org
To: Johnathan Williams <jwilliams@accelerated.org>, Asha Marshall
<amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.05.a)
Date: Friday, April 05, 2019 11:42 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com.

jwilliams@accelerated.org
amarshall@accelerated.org

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Fwd: CPRA request (TAS.2019.04.05.a)

Adrian

Subject: Re: Fwd: CPRA request (TAS.2019.04.05.a)

From: adrian@123mail.org

Date: 7/8/19, 9:08 AM

To: "Robert French" <rfrench@accelerated.org>

CC: vshih@accelerated.org, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org

To: Johnathan Williams <jwilliams@accelerated.org>, Asha Marshall <amarshall@accelerated.org>

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Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts

through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: Fwd: CPRA request (TAS.2019.04.05.a)
From: adrian@123mail.org
Date: 8/18/19, 5:59 PM
To: "Robert French" <rfrench@accelerated.org>
CC: "Vincent Shih" <vshih@accelerated.org>, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

Good evening, TAS.

I'm just wondering what the status of this is.

Thanks,

Adrian

On Mon, Jul 8, 2019, at 9:08 AM, adrian@123mail.org wrote:

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org

To: Johnathan Williams <jwilliams@accelerated.org>, Asha Marshall <amarshall@accelerated.org>

Subject: CPRA request (TAS.2019.04.05.a)

Date: Friday, April 05, 2019 11:42 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com.

jwilliams@accelerated.org
amarshall@accelerated.org

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g.

+++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the

record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Exhibit E

Subject: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 4/5/19, 11:47 AM

To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: RE: CPRA request (TAS.2019.04.05.b)
From: Asha Marshall <amarshall@accelerated.org>
Date: 4/8/19, 9:20 AM
To: "adrian@123mail.org" <adrian@123mail.org>, Johnathan Williams <jwilliams@accelerated.org>

Hello Adrian,

Can you provide me with the initial request for this CPRA? I have seen the emails between yourself and Johnathan; however, I need additional information as to what this is about.

Thanks,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>
Sent: Friday, April 5, 2019 11:48 AM
To: Johnathan Williams <jwilliams@accelerated.org>; Asha Marshall <amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.05.b)

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Thanks!

Adrian

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Subject: Re: CPRA request (TAS.2019.04.05.b)
From: adrian@123mail.org
Date: 4/8/19, 9:49 AM
To: "Asha Marshall" <amarshall@accelerated.org>, "Johnathan Williams" <jwilliams@accelerated.org>

Hello Ms. Marshall.

I am not sure what you are asking me for. The initial request is right there below in your response to me.

On Mon, Apr 8, 2019, at 9:20 AM, Asha Marshall wrote:

Hello Adrian,

Can you provide me with the initial request for this CPRA? I have seen the emails between yourself and Johnathan; however, I need additional information as to what this is about.

Thanks,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246
www.accelerated.org

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>
Sent: Friday, April 5, 2019 11:48 AM
To: Johnathan Williams <jwilliams@accelerated.org>; Asha Marshall <amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.05.b)

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically

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Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

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Subject: RE: CPRA request (TAS.2019.04.05.b)
From: Asha Marshall <amarshall@accelerated.org>
Date: 4/8/19, 9:59 AM
To: "adrian@123mail.org" <adrian@123mail.org>, Johnathan Williams <jwilliams@accelerated.org>

Hi Adrian,

Please do not contact our email addresses. This is a false request!

Thanks,

Asha A. Marshall
Human Resources Manager

116 E. Martin Luther King Jr. Blvd.
Los Angeles, CA. 90011
Ph. 323-235-6343 x2603
Fx 323-234-1246

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>
Sent: Monday, April 8, 2019 9:49 AM
To: Asha Marshall <amarshall@accelerated.org>; Johnathan Williams <jwilliams@accelerated.org>
Subject: Re: CPRA request (TAS.2019.04.05.b)

Hello Ms. Marshall.

I am not sure what you are asking me for. The initial request is right there below in your response to me.

On Mon, Apr 8, 2019, at 9:20 AM, Asha Marshall wrote:

Hello Adrian,

Can you provide me with the initial request for this CPRA? I have seen the emails between yourself and Johnathan; however, I need additional information as to what this is about.

Thanks,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246

<https://nam02.safelinks.protection.outlook.com/?url=www.accelerated.org&data=01%7C01%7Camarshall%40accelerated.org%7C304dee75b28e4bad456008d6bc422110%7Ce2f697b976974041994605fe2d93acc4%7C1&sdata=PCUVrr0e9eldHufxehPLRds2Ryhh6%2F0QvugeEzdSLC4%3D&reserved=0>

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>

Sent: Friday, April 5, 2019 11:48 AM

To: Johnathan Williams <jwilliams@accelerated.org>; Asha Marshall <amarshall@accelerated.org>

Subject: CPRA request (TAS.2019.04.05.b)

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Thanks!

Adrian

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Subject: Re: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 4/8/19, 10:06 AM

To: "Asha Marshall" <amarshall@accelerated.org>, "Johnathan Williams" <jwilliams@accelerated.org>

What are you talking about? This is a CPRA request and you are required by law to provide me access to records.

On Mon, Apr 8, 2019, at 9:59 AM, Asha Marshall wrote:

Hi Adrian,

Please do not contact our email addresses. This is a false request!

Thanks,

Asha A. Marshall
Human Resources Manager

116 E. Martin Luther King Jr. Blvd.
Los Angeles, CA. 90011
Ph. 323-235-6343 x2603
Fx 323-234-1246

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>

Sent: Monday, April 8, 2019 9:49 AM

To: Asha Marshall <amarshall@accelerated.org>; Johnathan Williams
<jwilliams@accelerated.org>

Subject: Re: CPRA request (TAS.2019.04.05.b)

Hello Ms. Marshall.

I am not sure what you are asking me for. The initial request is right there below in your response to me.

On Mon, Apr 8, 2019, at 9:20 AM, Asha Marshall wrote:

Hello Adrian,

Can you provide me with the initial request for this CPRA? I have seen the emails between yourself and Johnathan; however, I need additional information as to what this is about.

Thanks,

Asha Marshall
Human Resources Manager

The Accelerated Schools
4000 S. Main Street
Tel: (323) 235-6343 ext 2603
Fax (323) 234-1246

<https://nam02.safelinks.protection.outlook.com/?url=www.accelerated.org&data=01%7C01%7Camarshall%40accelerated.org%7C304dee75b28e4bad456008d6bc422110%7Ce2f697b976974041994605fe2d93acc4%7C1&sdata=PCUVrr0e9eldHUfxehPLRds2Ryhh6%2F0QvugeEzdSLC4%3D&reserved=0>

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>
Sent: Friday, April 5, 2019 11:48 AM
To: Johnathan Williams <jwilliams@accelerated.org>; Asha Marshall <amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.05.b)

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g.

+++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any

disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

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Subject: Re: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 5/1/19, 10:33 AM

To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, TAS.

I'm just wondering about the status of this matter.

Thank you,

Adrian

On Fri, Apr 5, 2019, at 11:47 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 5/30/19, 3:29 AM

To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

Good morning, TAS.

I'm just wondering about the status of this matter.

Thank you,

Adrian

On Fri, Apr 5, 2019, at 11:47 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.05.b)
From: adrian@123mail.org
Date: 6/7/19, 5:21 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, Mr. Williams!

I am just writing to inquire about what the heck is going on with this request.

Thanks,

Adrian

On Thu, May 30, 2019, at 3:29 AM, adrian@123mail.org wrote:

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

Good morning, TAS.

I'm just wondering about the status of this matter.

Thank you,

Adrian

On Fri, Apr 5, 2019, at 11:47 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.05.b)
From: adrian@123mail.org
Date: 6/23/19, 9:18 PM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good evening, Mr. Williams.

If I don't hear from you conclusively on this matter by Friday, June 28, 2019, I will proceed as if you've explicitly denied me access to these records.

Thank you,

Adrian

On Fri, Jun 7, 2019, at 5:21 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams!

I am just writing to inquire about what the heck is going on with this request.

Thanks,

Adrian

On Thu, May 30, 2019, at 3:29 AM, adrian@123mail.org wrote:

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

Good morning, TAS.

I'm just wondering about the status of this matter.

Thank you,

Adrian

On Fri, Apr 5, 2019, at 11:47 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Fwd: CPRA request (TAS.2019.04.05.b)
From: adrian@123mail.org
Date: 6/30/19, 12:29 PM
To: "Robert French" <rfrench@accelerated.org>

----- Original message -----

From: adrian@123mail.org
To: Johnathan Williams <johnwilliams@accelerated.org>, Asha Marshall
<amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.05.b)
Date: Friday, April 05, 2019 11:47 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts
johnwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April
5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Fwd: CPRA request (TAS.2019.04.05.b)

Adrian

Subject: Re: Fwd: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 7/8/19, 9:09 AM

To: "Robert French" <rfrench@accelerated.org>

CC: vshih@accelerated.org, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org

To: Johnathan Williams <jwilliams@accelerated.org>, Asha Marshall <amarshall@accelerated.org>

Subject: CPRA request (TAS.2019.04.05.b)

Date: Friday, April 05, 2019 11:47 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts

through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: Fwd: CPRA request (TAS.2019.04.05.b)

From: adrian@123mail.org

Date: 8/18/19, 5:58 PM

To: "Robert French" <rfrench@accelerated.org>

CC: "Vincent Shih" <vshih@accelerated.org>, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

Good evening, TAS.

I'm just wondering about the status of this.

Thanks,

Adrian

On Mon, Jul 8, 2019, at 9:09 AM, adrian@123mail.org wrote:

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org

To: Johnathan Williams <jwilliams@accelerated.org>, Asha Marshall <amarshall@accelerated.org>

Subject: CPRA request (TAS.2019.04.05.b)

Date: Friday, April 05, 2019 11:47 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or amarshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc:

1. any email address at ccsa.org
2. any member of the board of trustees

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g.

+++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the

record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Additionally, please note that a version of a given email in one mailbox is a distinct record from a version in a different mailbox, so all such extant versions must be produced in response to this request. Also please note that if an email has multiple TAS-associated recipients, one may have deleted it while others may not. Thus in order to perform an adequate search in response to this request it is both necessary and sufficient to search each of the listed accounts through which business is conducted.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Exhibit F

Subject: CPRA request (TAS.2019.04.06.a)

From: adrian@123mail.org

Date: 4/6/19, 7:51 AM

To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS business possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that are to/from /cc/bcc Kevin Sved at any email address.

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 5/1/19, 10:33 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, TAS.

I'm just wondering about the status of this matter.

Thanks,

Adrian

On Sat, Apr 6, 2019, at 7:51 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS business possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any email address.

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 5/30/19, 3:30 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

Good morning, TAS.

I'm just wondering about the status of this matter.

Thanks,

Adrian

On Sat, Apr 6, 2019, at 7:51 AM, adrian@123mail.org wrote:

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS business possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any email address.

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

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Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any

disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 5/30/19, 9:24 AM
To: Asha Marshall <amarshall@accelerated.org>, "adrian@123mail.org" <adrian@123mail.org>

Good morning,

I have not had access to campus, and need to in order to get old email.

I also was informed that Ms. Marshall is no

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From: adrian@123mail.org <adrian@123mail.org>
Sent: Thursday, May 30, 2019 3:30:10 AM
To: Johnathan Williams; Asha Marshall
Subject: Re: CPRA request (TAS.2019.04.06.a)

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

> Good morning, TAS.

>

> I'm just wondering about the status of this matter.

>

> Thanks,

>

> Adrian

>

> On Sat, Apr 6, 2019, at 7:51 AM, adrian@123mail.org wrote:

> > Good morning, Mr. Williams.

> >

> > I am seeking to inspect/obtain copies of all emails related to TAS

> > business possessed by J. Williams in any account from January 1, 2018

> > through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any email

> > address.

> >

> > Please note that I need to see copies of the emails in native format as

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> > emails are MBOX, EML, or MSG. I also need to see all attachments to
> > these emails in their native formats. Please note that when you
> > provide emails in native format their attachments are automatically
> > included in native format.
> >
> > If you find it necessary to redact any of the emails, please note that
> > both EML and MBOX are text formats. The files can be opened in any
> > text editor, e.g. Notepad, and segregable exempt material can be
> > redacted by replacing it with innocuous symbols, e.g.
> > ++++++. Any other method of redaction destroys the
> > essential character, i.e. the searchability and sortability, of the
> > record and violates the CPRA at section 6253.9(a)(1). This method of
> > redaction is probably easier for you as well since it allows for search
> > and replace.
> >
> > Finally, if you choose to withhold or redact any records responsive to
> > this request, please take measures as you would under a standard
> > litigation hold not to delete those records until we have settled any
> > disputes over claimed exemptions to our mutual satisfaction. If there
> > are any records which would be responsive but for the fact that you've
> > chosen not to consider them to be public records for any reason, please
> > inform me of their existence and retain those under the same terms.
> >
> > Thanks!
> >
> > Adrian

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 5/30/19, 9:25 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>, "Asha Marshall" <amarshall@accelerated.org>

Thanks, Mr. Williams!

It's been two months now. Please find a way to comply with the law and provide me with these records.

Thanks again,

Adrian

On Thu, May 30, 2019, at 9:24 AM, Johnathan Williams wrote:

Good morning,

I have not had access to campus, and need to in order to get old email.

I also was informed that Ms. Marshall is no

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From: adrian@123mail.org <adrian@123mail.org>
Sent: Thursday, May 30, 2019 3:30:10 AM
To: Johnathan Williams; Asha Marshall
Subject: Re: CPRA request (TAS.2019.04.06.a)

Good morning, TAS.

I am writing to inquire about the status of this matter.

Thanks,

Adrian

On Wed, May 1, 2019, at 10:33 AM, adrian@123mail.org wrote:

> Good morning, TAS.

>

> I'm just wondering about the status of this matter.

>

> Thanks,

>

> Adrian

>
> On Sat, Apr 6, 2019, at 7:51 AM, adrian@123mail.org wrote:
> > Good morning, Mr. Williams.
> >
> > I am seeking to inspect/obtain copies of all emails related to TAS
> > business possessed by J. Williams in any account from January 1,
> > 2018
> > through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any
> > email
> > address.
> >
> > Please note that I need to see copies of the emails in native format
> > as
> > required by the CPRA at Section 6253.9(a)(1). Native formats for
> > emails are MBOX, EML, or MSG. I also need to see all attachments to
> > these emails in their native formats. Please note that when you
> > provide emails in native format their attachments are automatically
> > included in native format.
> >
> > If you find it necessary to redact any of the emails, please note
> > that
> > both EML and MBOX are text formats. The files can be opened in any
> > text editor, e.g. Notepad, and segregable exempt material can be
> > redacted by replacing it with innocuous symbols, e.g.
> > ++++++. Any other method of redaction destroys the
> > essential character, i.e. the searchability and sortability, of the
> > record and violates the CPRA at section 6253.9(a)(1). This method
> > of
> > redaction is probably easier for you as well since it allows for
> > search
> > and replace.
> >
> > Finally, if you choose to withhold or redact any records responsive
> > to
> > this request, please take measures as you would under a standard
> > litigation hold not to delete those records until we have settled
> > any
> > disputes over claimed exemptions to our mutual satisfaction. If
> > there
> > are any records which would be responsive but for the fact that
> > you've
> > chosen not to consider them to be public records for any reason,
> > please
> > inform me of their existence and retain those under the same terms.
> >
> > Thanks!
> >

> > Adrian

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Subject: Re: CPRA request (TAS.2019.04.06.a)
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 5/30/19, 9:27 AM
To: "adrian@123mail.org" <adrian@123mail.org>

Ms. Asha Marshall is no longer an employee of The Accelerated Schools.

If, and when I get access, I will respond.

Thank you.

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From: Human Resources
Sent: Thursday, May 30, 2019 9:24:25 AM
To: Johnathan Williams
Subject: Automatic reply: CPRA request (TAS.2019.04.06.a)

We have received your message and will respond within 48 to 72 business hours.

Thank you,

Human Resources Department

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 5/30/19, 9:38 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Mr. Williams,

This is not how the law works. Your organization is subject to the public records act and has control over its records. You can't just stall by saying you don't have access. Someone must have access. Please find out who it is and get them to produce these records.

Also, it's really dubious that you don't have access to your emails. You're sending emails through your server right now, which requires access. Why don't you use Outlook on a computer wherever you are, or install Thunderbird, and use one of those to download your emails?

Thanks,

Adrian

On Thu, May 30, 2019, at 9:27 AM, Johnathan Williams wrote:

Ms. Asha Marshall is no longer an employee of The Accelerated Schools.

If, and when I get access, I will respond.

Thank you.

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From: Human Resources
Sent: Thursday, May 30, 2019 9:24:25 AM
To: Johnathan Williams
Subject: Automatic reply: CPRA request (TAS.2019.04.06.a)

We have received your message and will respond within 48 to 72 business hours.

Thank you,

Human Resources Department

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privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

Subject: Re: CPRA request (TAS.2019.04.06.a)
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 5/30/19, 9:47 AM
To: "adrian@123mail.org" <adrian@123mail.org>

You are correct. I am responding from a mobile device, and need access to my desktop for archived emails.

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From: adrian@123mail.org <adrian@123mail.org>
Sent: Thursday, May 30, 2019 9:38:05 AM
To: Johnathan Williams
Subject: Re: CPRA request (TAS.2019.04.06.a)

Mr. Williams,

This is not how the law works. Your organization is subject to the public records act and has control over its records. You can't just stall by saying you don't have access. Someone must have access. Please find out who it is and get them to produce these records.

Also, it's really dubious that you don't have access to your emails. You're sending emails through your server right now, which requires access. Why don't you use Outlook on a computer wherever you are, or install Thunderbird, and use one of those to download your emails?

Thanks,

Adrian

On Thu, May 30, 2019, at 9:27 AM, Johnathan Williams wrote:

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Thank you.

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From: Human Resources
Sent: Thursday, May 30, 2019 9:24:25 AM
To: Johnathan Williams
Subject: Automatic reply: CPRA request (TAS.2019.04.06.a)

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Thank you,

Human Resources Department

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Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 5/30/19, 9:50 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Great, what's the problem then? The law imposes a duty on your organization which is not mitigated by the fact that you all are too disorganized to comply with it. This is actually the law in California per Community Youth Athletic Center v. City of National City:

"It would not be a practical or reasonable interpretation of Government Code section 6259, subdivision (d), to say that a public agency is protected from liability for an attorney fees award because it cannot or will not produce the documents due to its internal logistical problems or general neglect of duties."

Please figure out a way to get these emails soon.

Thanks!

Adrian

On Thu, May 30, 2019, at 9:47 AM, Johnathan Williams wrote:

You are correct. I am responding from a mobile device, and need access to my desktop for archived emails.

Get [Outlook for Android](#)

From: adrian@123mail.org <adrian@123mail.org>
Sent: Thursday, May 30, 2019 9:38:05 AM
To: Johnathan Williams
Subject: Re: CPRA request (TAS.2019.04.06.a)

Mr. Williams,

This is not how the law works. Your organization is subject to the public records act and has control over its records. You can't just stall by saying you don't have access. Someone must have access. Please find out who it is and get them to produce these records.

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Ms. Asha Marshall is no longer an employee of The Accelerated Schools.

If, and when I get access, I will respond.

Thank you.

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From: Human Resources

Sent: Thursday, May 30, 2019 9:24:25 AM

To: Johnathan Williams

Subject: Automatic reply: CPRA request (TAS.2019.04.06.a)

We have received your message and will respond within 48 to 72 business hours.

Thank you,

Human Resources Department

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Subject: Re: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 6/7/19, 5:22 AM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good morning, Mr. Williams!

Am just wondering what's up with this now two-month-old matter?

Thanks,

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Subject: Re: CPRA request (TAS.2019.04.06.a)
From: Johnathan Williams <jwilliams@accelerated.org>
Date: 6/7/19, 9:39 AM
To: "adrian@123mail.org" <adrian@123mail.org>

Good morning,
I should have access tomorrow and Sun.
Thank you.

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From: adrian@123mail.org <adrian@123mail.org>
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To: Johnathan Williams
Subject: Re: CPRA request (TAS.2019.04.06.a)

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From: adrian@123mail.org
Date: 6/23/19, 9:20 PM
To: "Johnathan Williams" <jwilliams@accelerated.org>

Good evening, Mr. Williams.

If I don't hear from you conclusively on this matter by Friday, June 28, 2019, I will proceed as if you've explicitly denied me access to these records.

Thank you,

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Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 7/8/19, 9:09 AM
To: "Robert French" <rfrench@accelerated.org>
CC: vshih@accelerated.org, ericj@victory-group.com, Board@accelerated.org, dborovay@accelerated.org, mwatson@accelerated.org, sslovac@calstatela.edu

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org
To: Johnathan Williams <ajwilliams@accelerated.org>, Asha Marshall <amarshall@accelerated.org>
Subject: CPRA request (TAS.2019.04.06.a)
Date: Saturday, April 06, 2019 7:51 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS business possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any email address.

Please note that I need to see copies of the emails in native format as required by the CPRA at Section 6253.9(a)(1). Native formats for emails are MBOX, EML, or MSG. I also need to see all attachments to these emails in their native formats. Please note that when you provide emails in native format their attachments are automatically included in native format.

If you find it necessary to redact any of the emails, please note that both EML and MBOX are text formats. The files can be opened in any text editor, e.g. Notepad, and segregable exempt material can be redacted by replacing it with innocuous symbols, e.g. ++++++. Any other method of redaction destroys the essential character, i.e. the searchability and sortability, of the record and violates the CPRA at section 6253.9(a)(1). This method of redaction is probably easier for you as well since it allows for search and replace.

Finally, if you choose to withhold or redact any records responsive to this request, please take measures as you would under a standard litigation hold not to delete those records until we have settled any disputes over claimed exemptions to our mutual satisfaction. If there are any records which would be responsive but for the fact that you've chosen not to consider them to be public records for any reason, please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

Subject: RE: Fwd: CPRA request (TAS.2019.04.06.a)
From: Vincent Shih <vshih@accelerated.org>
Date: 7/8/19, 6:59 PM
To: "adrian@123mail.org" <adrian@123mail.org>, Robert French <rfrench@accelerated.org>
CC: "ericj@victory-group.com" <ericj@victory-group.com>, Board Members <board@accelerated.org>, Mia Watson <mwatson@accelerated.org>, "sslovac@calstatela.edu" <sslovac@calstatela.edu>

Dear Requestor:

Thank you for your patience in this matter. The District sent you its response to your March 18 and March 24 PRA requests. We are still in the process of locating the documents that you requested. If there are responsive, non-exempt documents, you should expect that production shortly.

Please feel free to contact me with any questions that you may have.

Vincent Shih

Accounting Manager

[The Accelerated Schools](#)

Phone: (323) 235-6343 ext. 2634

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Sent: Monday, July 8, 2019 9:09 AM
To: Robert French <rfrench@accelerated.org>
Cc: Vincent Shih <vshih@accelerated.org>; ericj@victory-group.com; Board Members <board@accelerated.org>; David Borovay <dborovay@accelerated.org>; Mia Watson <mwatson@accelerated.org>; sslovac@calstatela.edu

Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

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> From: adrian@123mail.org
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> <amarshall@accelerated.org>
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> Date: Saturday, April 06, 2019 7:51 AM
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> Good morning, Mr. Williams.
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> Adrian

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— Attachments: —

CPRA Request_3.18.19.pdf	108 kB
CPRA Request_3.24.19.pdf	121 kB

Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

From: adrian@123mail.org

Date: 7/8/19, 7:01 PM

To: "Vincent Shih" <vshih@accelerated.org>, "Robert French" <rfrench@accelerated.org>

CC: "ericj@victory-group.com" <ericj@victory-group.com>, "Board Members" <board@accelerated.org>, "Mia Watson" <mwatson@accelerated.org>, "sslovac@calstatela.edu" <sslovac@calstatela.edu>

As it happens, I do have a question. A response to this request was due more than three months ago by law, and yet, even now, you all have failed to respond to it adequately. The question is, of course, when may I expect a legally sufficient response?

Thanks again for your help!

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Cc: Vincent Shih <vslih@accelerated.org>; erici@victory-group.com;
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sslovac@calstatela.edu
Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

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To: Johnathan Williams <johnwilliams@accelerated.org>, Asha Marshall

<amarshall@accelerated.org>

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Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 8/3/19, 10:20 AM
To: "Vincent Shih" <vshih@accelerated.org>, "Robert French" <rfrench@accelerated.org>
CC: "ericj@victory-group.com" <ericj@victory-group.com>, "Board Members" <board@accelerated.org>, "Mia Watson" <mwatson@accelerated.org>

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I'm just wondering what's up with this matter. Please don't continue to ignore it.

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CC: "ericj@victory-group.com" <ericj@victory-group.com>, Board Members <board@accelerated.org>, Mia Watson <mwatson@accelerated.org>

Good morning,

Your request is currently in production and being reviewed. It will be sent to you shortly.

Thank you.

-----Original Message-----

From: adrian@123mail.org <adrian@123mail.org>

Sent: Saturday, August 3, 2019 10:20 AM

To: Vincent Shih <vshih@accelerated.org>; Robert French <rfrench@accelerated.org>

Cc: ericj@victory-group.com; Board Members <board@accelerated.org>; Mia Watson <mwatson@accelerated.org>

Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

Good morning, TAS.

I'm just wondering what's up with this matter. Please don't continue to ignore it.

Thanks,

Adrian

On Mon, Jul 8, 2019, at 7:01 PM, adrian@123mail.org wrote:

As it happens, I do have a question. A response to this request was due more than three months ago by law, and yet, even now, you all have failed to respond to it adequately. The question is, of course, when may I expect a legally sufficient response?

Thanks again for your help!

Adrian

On Mon, Jul 8, 2019, at 6:59 PM, Vincent Shih wrote:

Dear Requestor:

Thank you for your patience in this matter. The District sent you its response to your March 18 and March 24 PRA requests. We are still in the process of locating the documents that you requested. If there are responsive, non-exempt documents, you should expect that production shortly.

Please feel free to contact me with any questions that you may have.

Vincent Shih

Accounting Manager

The Accelerated Schools

<<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.accelerated.org%2F&data=01%7C01%7Cvshih%40accelerated.org%7C7065d5275c8b4ec83e8008d71836d61b%7Ce2f697b976974041994605fe2d93acc4%7C1&sdata=nsQwvAKEg7BgZMQc7b9DY6a2bI%2FTyfxJlZ28TUqBTgo%3D&reserved=0>>

Phone: (323) 235-6343 ext. 2634

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-----Original Message-----

From: adrian@l23mail.org <adrian@l23mail.org>
Sent: Monday, July 8, 2019 9:09 AM
To: Robert French <rffrench@accelerated.org>
Cc: Vincent Shih <vshih@accelerated.org>; ericj@victory-group.com;
Board Members <board@accelerated.org>; David Borovay
<dborovay@accelerated.org>; Mia Watson <mwatson@accelerated.org>;
sslovac@calstatela.edu
Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)

On Sun, Jun 30, 2019, at 12:29 PM, adrian@123mail.org wrote:

----- Original message -----

From: adrian@123mail.org

To: Johnathan Williams jjwilliams@accelerated.org, Asha Marshall
amarshall@accelerated.org

Subject: CPRA request (TAS.2019.04.06.a)

Date: Saturday, April 06, 2019 7:51 AM

Good morning, Mr. Williams.

I am seeking to inspect/obtain copies of all emails related to TAS
business possessed by J. Williams in any account from January 1,
2018
through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any
email
address.

Please note that I need to see copies of the emails in native format

as required by the CPRA at Section 6253.9(a)(1). Native formats for

emails are MBOX, EML, or MSG. I also need to see all attachments to

these emails in their native formats. Please note that when you

provide emails in native format their attachments are automatically

included in native format.

If you find it necessary to redact any of the emails, please note that

both EML and MBOX are text formats. The files can be opened in any

text editor, e.g. Notepad, and segregable exempt material can be

redacted by replacing it with innocuous symbols, e.g.

+++++. Any other method of redaction destroys the

essential character, i.e. the searchability and sortability, of the

record and violates the CPRA at section 6253.9(a)(1). This method of

redaction is probably easier for you as well since it allows for

search and replace.

Finally, if you choose to withhold or redact any records responsive to

this request, please take measures as you would under a standard

litigation hold not to delete those records until we have settled any

disputes over claimed exemptions to our mutual satisfaction. If there

are any records which would be responsive but for the fact that you've

chosen not to consider them to be public records for any reason,

please inform me of their existence and retain those under the same terms.

Thanks!

Adrian

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Attachments:

- * CPRA Request_3.18.19.pdf
- * CPRA Request_3.24.19.pdf

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Subject: Re: Fwd: CPRA request (TAS.2019.04.06.a)
From: adrian@123mail.org
Date: 8/18/19, 5:57 PM
To: "Vincent Shih" <vshih@accelerated.org>, "Robert French" <rfrench@accelerated.org>
CC: "ericj@victory-group.com" <ericj@victory-group.com>, "Board Members" <board@accelerated.org>, "Mia Watson" <mwatson@accelerated.org>

Good evening, TAS.

I'm just wondering what is the status of this matter. As I'm sure you're aware, stalling on this for more than four months is a violation of the CPRA.

Thanks,

Adrian

On Mon, Aug 5, 2019, at 6:47 AM, Vincent Shih wrote:

Good morning,

Your request is currently in production and being reviewed. It will be sent to you shortly.

Thank you.

-----Original Message-----

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Sent: Saturday, August 3, 2019 10:20 AM
To: Vincent Shih <vshih@accelerated.org>; Robert French <rfrench@accelerated.org>
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Cc: Vincent Shih <vslih@accelerated.org>; ericj@victory-group.com;
Board Members <board@accelerated.org>; David Borovay
<dborovay@accelerated.org>; Mia Watson <mwatson@accelerated.org>;
sslovac@calstatela.edu
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